



PRIVACY POLICY

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FOR CUSTOMERS

CONTENTS.

PART 1: Introduction and Summary

PART 2 : The legal bases in which we rely on to collect your data

PART 3: When do we collect your personal data?

PART 4: What sort of personal data do we collect?

PART 5: How and why do we use your personal data?

PART 6: Direct marketing and opt-out

PART 7: How long will we keep your personal data?

PART 8: Who do we share your personal data with?

PART 9: Where your personal data may be processed

PART 10: Your right to privacy

PART 11: Cookies (the electronic ones!)

PART 12: Relevant contact information

1. Introduction and Summary

Hello and welcome to our Privacy Policy. This policy specifically relates to Step Up only and details the types of personal data we may collect about you when you interact or register with us. Furthermore, this policy explains how we store and handle that data whilst maintaining its safety.

There is a lot of information contained within this policy, but it is your legal right to be fully informed. Therefore, by reading this document in full, you should receive the detail required to understand what Step Up does with your data and how we maintain contact with you using the data you provide. This document also explains how 'cookies' may influence your user-experience via our website and third-party booking system whilst also detailing how you can opt-out of our direct marketing. EU GDPR – Data Protection Regulation 2018 The introduction of the new GDPR (General Data Protection Regulation 2018) in May 2018 outlines new rules for the way businesses collect data. To use our services, we must collect, use and hold some of your personal and contact data.

With this new regulation, you can change the way we use your data or 'opt-out' of certain items at any time by emailing us:

stepupdancestudios@gmail.com. Please note that if you choose to opt-out of certain items, you may be unable to access some or all of our services.

Read on to understand more. For the ease of understanding this document, 'data', refers to any personal details we collect from either yourself or in relation to your child.

To ensure we are always compliant, we may need to update this Privacy Policy at any point. Any significant changes that are likely to influence you as a consumer, will be communicated via email. Of course, as this is a public document, you can view it 24/7 should you need to at www.stepupdancestudios.co.uk

2. The legal bases in which we rely on to collect your data

Data protection law outlines a number of reasons for which a company may collect and process your data,

including:

CONSENT

In certain circumstances, we can collect and process the data you provide us with your positive consent.

For example, like when you 'tick' a box to receive monthly newsletters.

CONTRACTUAL OBLIGATION

In some cases, we need you or your child's personal data to comply with our contractual obligation to you.

For example, if you book your child into a class with us, we require your contact details including home

address and phone number as well as your child's notable medical information in the event of an emergency.

LEGAL COMPLIANCE

If the law requires us to, we may need to collect and process your data.

For example, we may need to pass on your data to the police if by chance, you or your child is involved or

subject to criminal activity. During Covid-19, we may be required legally to collect, process and share your data

for track & trace purposes as requested by the Scottish Government.

LEGITIMATE INTERESTS

In specific situations, we require your data to pursue our legitimate interests in a way that may reasonably be

expected, to be able to run our business. Such action does not materially impact on your rights, freedom or interests.

For example, we may use your email address to contact you with specific information relating to your child/our

services in which they take part, important notices or changes and any other relevant information that is

fundamental in our contractual obligation to you as our customer.

3 . When do we collect your data?

- **When you book a class for either yourself or your child**
This is done through the web page enrolment booking form
- **When you hire our premises**
- **When you buy any merchandise or other items we sell at any given time**
- **When you contact us with a query or complaint via email, telephone, social media or in person**
- **When you complete any surveys or questionnaires**
- **When you complete any online forms (when applicable) for specific reasons**
- **When you use our premises (or any premises that we operate in) that uses CCTV – these systems may record your image during your visit but only for safety reasons within public areas**
- **Whilst Covid-19 restrictions and guidelines exist, we may be required to collect data for test & trace purposes for certain offerings.**

4. What sort of data do we collect?

If you fill out an enrolment form for our Dance database, we will ask you (as the parent) for:

- Your full name**
- Home address**
- Email address**
- Telephone number**
- Emergency contact number(s)**

We will also ask for details in relation to your child (if applicable, for U18s) including:

- Full name**
- Gender**
- Date of birth**
- Notable medical information relevant (in cases of emergency)**
- What classes and grades**

In the interest of clarity, children or young adults under the age of 18 are not permitted to sign themselves up to any Step Up offering or service, due to the financial tie attached. Parental consent is required for admission to any offering or service with us and therefore parents/legal guardians must act on their behalf when registering.

It's at your own discretion which information you choose to share with us – whether it be directly or via the enrolment form.

We operate CCTV at our premises, Arch 5 Palmerston Road Aberdeen AB11 5RE, for the purposes of student & staff safety and crime prevention. Your image, including vehicle registration, may be recorded if you attend the above address.

Throughout the Covid-19 Pandemic, we may collect personal information from you for the purposes of track & trace as requested by the Scottish Government. This may include your full name and contact number.

5. How and why do we use your data?

We only collect the data about you that is absolutely essential. It is important, given the vulnerable nature of our clientele, that we collect reasonable contact details from parents or guardians, to be able to make prompt

contact with them in the event of an emergency for any reason. To meet our contractual obligation to you as a customer, we will use your email address and mobile number

to:

- Send confirmations of class bookings you have made
- Send confirmations of class bookings that you have requested we make on your behalf
 - Send invoices of payments/outstanding payments
 - Inform you of any class changes or urgent notices
- Notify you of any notable changes in Step Up Dance policies or procedures
- Notify you of any other relevant information that directly affects you as a customer

We will only use your email address to send you marketing/promotional material if we have your consent to do so. Just so you know, we sometimes use Mailchimp to send email marketing campaigns. Of course, you can change how we use your data and request that we do so by emailing stepupdancestudios@gmail.com but please remember that some changes may result in us not being able to

provide you with the services you have originally requested and may therefore result in request refusal. For example, if your child is an active student and you've asked us to remove your email address and telephone number from our records we would be unable to contact you about class changes, new term notices, outstanding balances and other important information relating to you/your child's class. In scenarios like this and depending on your individual situation, we may reasonably refuse any request you make.

Information you provide (especially your child's personal data) will be used for the purposes of class placement and class registers (name and age) – if you do not provide us with certain details, we are unable to fulfil our contractual obligations to you.

For example, if you fail to provide your child's correct date of birth, we are unable to place your child in the correct class for their age group – meaning we are unable to fulfil our service to you.

How and why do we use your data?

To ensure the maximum safety and protection of our business premises, we operate 24hr CCTV – which is recorded and stored for up to 2 weeks after live recording. We do this on the basis of our legitimate business interests.

If we, by chance, discover any criminal activity through our CCTV recordings, we will contact the relevant authorities accordingly and transfer any recordings in line with any lawful request. This is to protect the individuals who use our premises.

On the subject of law, we may use your data and share this with law enforcement. For example, when a court order is submitted to share data with law enforcement agencies or a court of law –

we are obliged to provide the personal data we have collected about you.

We may need to share your personal data with other appropriate organisations/authorities such as the NHS/Government/Local Council, especially during Covid-19 for track and trace purposes.

For example, if there is a Covid-19 case discovered at our premises and you were on the premises on the

day/time, we may pass your details to the appropriate organisations for them to contact you and advise you on

the specific measures to take. Only Step Up staff or duly authorised sub-contracted staff or volunteers can access or view your personal data – and only under legitimate business interests.

6: Direct marketing and opt-out

Step Up will only ever contact you with relevant and honest marketing material if we have your consent to do so. If we do have your consent, we may periodically contact you via email or text, to offer you our services in which we feel you would be genuinely interested in.

For example, if your child enjoys their current dance class and we launch a new offering that we feel you/your child would be interested in – we may contact you to see if you would like to know more about the service. This includes holiday camps and events..

Direct marketing and opt-out

Of course, if you no longer wish to receive direct marketing through email, text regarding Step Up offerings that may be of interest to you, then you can request to opt-out by either:

- Emailing: stepupdancestudios@gmail.com

Remember, by opting-out, we may be unable to offer some of our services to you and you may miss out on some exciting stuff that goes on from time-to-time with Step Up

For example, if you ask us to remove you from the email/text mailing list(s), you will only receive information that is specific to your/your child's class and you will not receive any updates regarding new classes, upcoming holiday camps, special offers or similar.

If you are in any doubt however, please say hello as we'd be happy to clarify.

7: How long will we keep your data?

We only keep the data you've provided to us for 1 year and you have to re-enrol. Beyond this point, we may still retain certain information regarding any payments/transactions you have made to us to meet our own legal obligations.

Any contractual documents such as room hire agreements in which you share personal data with us, will be kept for up to 6 years after final hire due to our own legal obligations regarding retention of financial records.

Financial data, including payroll documents and transaction details, may be stored for a period of up to 6 years after you cease activities with us due to our own legal obligations regarding retention of financial records.

Any other personal data you share with us like contact information via alternate methods such as track and trace, email or text are deleted 18 months after collection, unless you request us to remove such details before then Only staff or duly authorised volunteers/sub-contractors (e.g. teaching staff) are able to view any personal data

you• 1) Are still an active student with us – we need to have essential details about you/your child to fulfil our contractual obligation to you

• 2) Have an outstanding financial balance due to us, linked to a service we have provided to you – until such an amount is settled

Note: web data is electronically deleted/removed and any data in hard-copy format is disposed of via an appropriate confidential waste method.

8. Who do we share your personal data with?

we DO NOT share or sell your personal data to any other third party company, unless the specific circumstance below applies to you/your child:

If you are a student who takes part in Examinations and/or Competitions, we are sometimes required to share personal information with external organisations such as Educational Bodies and Competition Providers.

This may include a copy of either your Passport or Birth Certificate for proof of identity. We only share this information if you (as a parent/guardian or responsible adult) permit us to.

Your personal data is important to us, so it's important that we only use it for our specific business purposes – nothing else.

Remember, it may be necessary for us to share your information with local authorities, law enforcement and for any other legal reason and in such cases, we do not require your consent to do so.

PART 9: Where your personal data may be processed

It may be necessary from time-to-time for staff or volunteers to process your personal data (such as a name) privately between you and/or staff on social media platforms like Facebook, Instagram or WhatsApp for the purposes of:

- Amending or updating class details and/or registers at short notice**
- Informing teaching staff or similar of any important changes at short notice**
- Co-ordinating events, competitions or similar quickly and easily**
- Updating any records, with information you've provided via the above platforms**

For example, your child may suddenly be unable to attend one of our classes – 15 minutes before it starts. You get in touch with us by messaging via Facebook and tell us insert child name here cannot attend – sharing personal data. In this case, it is too-short notice to inform the teacher via email about the change and they may be unable to take a phone call, so we may have to message the teacher your child's name to inform them of the absence – simply so the teacher is aware and so as not to raise any wellbeing concerns for the child.

Our staff will only process data like this between other staff on social media/messaging platforms, privately. This will only be done if considered absolutely essential - under reasonable and sometimes urgent circumstances

As a parent, student or attendee you can also, at your own discretion and responsibility, join any Facebook/Instagram group or page that is created by Step Up. By doing so, you accept that you are wilfully sharing your own personal data on a Step Up associated group or page that is either publicly viewable or viewable to other private group members through:

- 1) Sharing your name (via your Facebook/Instagram username)
- 2) Sharing your image (via a profile photograph of yourself)
- 3) Sharing any other personally identifiable data yourself, wilfully

Where your data may be processed For example, we have our public Facebook page which is viewable to anyone, publicly, who visits online. If you

choose to comment or share any personal data (like names, addresses, phone numbers etc). on our public feed, other Facebook users may be able to see this data too. If you were to instead message us privately on

Facebook through Messenger, this information is held strictly between the staff member and data subject only.

Remember, Facebook, Instagram and WhatsApp operate their own privacy policies which are applicable when you use their respective sites/apps:

Facebook: <https://www.facebook.com/about/privacy/update>

Instagram: https://help.instagram.com/519522125107875?helpref=page_content

WhatsApp: <https://www.whatsapp.com/legal/?eea=1#privacy-policy>

Such social media pages or groups associated with Step Up are only created for genuine business purposes and to assist the efficient and informative service we provide to our customers.

You, as a data subject, should not wilfully share any specific personal or sensitive data about yourself publicly on any Step Up associated social media platform – only do so at your own discretion and awareness of the potential risks of sharing such data. Any personal data that is wilfully shared with Step Up on social media platforms is carefully and professionally collected and processed by staff only. Although we do so to the best of our ability, we do not recommend sharing sensitive data (like addresses, phone numbers, medical records or bank details) this way due to discrepancies and risks in social media security. We recommend that you email any personal/sensitive data instead, if circumstances permit.

PHOTOGRAPHY / VIDEOGRAPHY

We will only process or share personal data such as photography and videography for marketing purposes, if you have permitted us to do so

PART 10: Your right to privacy

It's important to know your rights. Let's break things down:

What you can request:

- Access to the personal data we hold about you or your child – free of charge
- That we correct or amend any personal data we hold about you e.g. new phone number or email address
- That we no longer send marketing or promotional material to you

If you wish to access, amend or remove the personal data that we hold about you or your child, please email us:

stepupdancestudios@gmail.com and allow for up to 30 days for your request to be actioned.

If we cannot satisfy your request for any reason, we will let you know why – this includes refusal of your request and any uncontrollable delays we may face in obtaining your information at short-notice.

Remember, if you've opted-in at any point with us (or any company) to use or process your personal data, it is your legal right to be able to withdraw your consent at any time. You can do this by following the contact method above.

We may, from time-to-time, rely on legitimate interest for using or processing your data however you may ask us to stop doing so in relation to your specific circumstance using the contact method above.

We will action such requests only if we do not have a genuine reason to continue using or processing your personal data. You can request that we stop using your personal data to contact you with marketing/promotional material at any time, even if you have given us previous consent. We will always honour such a request which should be made using the contact method above.

PART 11: Cookies (the electronic ones!)

By continuing to use www.stepupdancestudios.co.uk , or the "Site", without acknowledging or taking action on the Cookie Notification that appears on the home page, you hereby agree to our/Wix use of cookies in the manner described in this notice.

Cookies are small text files that are stored on your browser or hard drive on your computer, or other device, when you visit the Site. This basically allows the Site to recognise you, as a user, for the duration of your Site visit (using a 'session cookie') or for repeat visits (a 'persistent cookie'). These are not harmful in any way and do not contain any sensitive data such as your date of birth, address or card details.

Effectively, cookies are in place to improve user experience when visiting websites, including ours. We use cookies for a number of purposes - some of which are strictly necessary, including but not limited to items such as language preferences and other user settings. Note that some cookies are automatically 'enabled' on browsers/devices, but read on should you need help on how to adjust your preferences regarding cookies. We use Wix to host our website, refer to their statement regarding cookies within their privacy policy, here:

<https://support.wix.com/en/article/creating-a-terms-and-conditions-policy>

You can manage the cookies on your computer or devices through your internet browser/settings – help links provided below. Please note that Step Up is not responsible for the content of external websites:

Firefox: <http://support.mozilla.org/en-US/kb/>

Safari: <https://support.apple.com/kb/PH19214>

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

Internet Explorer <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

If you choose to disable cookies use, then you may restrict your user experience on not only our Site, but also the websites of the third-party companies we use to support our business activities.

PART 12 Relevant contact information

We really hope this policy has been clear and helpful in allowing you to understand the way we handle your data, including your rights over it.

If by chance you have a question that hasn't been discussed above, or simply want to discuss our Privacy Policy further, feel free to contact us by:

- Email: stepupdancestudios@gmail.com
- Post: Step Up Dance Studios, Arch 5, Palmerston Road, Aberdeen AB11 5RE

To find out more information regarding the GDPR and to make any complaints, please visit the governing body website at: www.ico.org.uk

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