

The Debbie Millar School of Dance – Privacy Policy

We know that you take the privacy of your information and how it is used and shared very seriously, and we will only use your personal information in accordance with the current data protection law in the UK and this privacy policy.

This privacy notice provides you with details of how we collect and process your personal data.

The Debbie Millar School of Dance is the data controller and we are responsible for your personal data (referred to as “DMSD”, “we”, “us” or “our” in this privacy notice).

Contact Details

Our full details are:

Full name of legal entity: Debbie Millar trading as Debbie Millar School of Dance

Email address: debbie@debbiemillar.co.uk

Main Business and Postal address: 8 Chapel Croft, Ardleigh, Essex. CO7 7TQ

Telephone number: 01206 230806

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at rc.millar@btinternet.com Chris Millar has responsibility for data security at DMSD.

WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, date of birth (of children), address, email address, phone number, contact details and class/event & purchase details. Our lawful ground for this processing is legitimate interest to enable us to provide the goods and/or services you have purchased, or those that have been purchased on your behalf and to keep records of such transactions.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and your communication preferences. We process this data to enable you to receive information about classes and events and to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to improve our products/services, to develop them, to grow our business and to decide our marketing strategy.
- We may use **Customer Data and Marketing Data** to deliver relevant website content and advertisements to you and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. You may object to this type of processing by unsubscribing using the link in any email that you receive.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you).

If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at debbie@debbiemillar.co.uk

Children need particular protection and so we only collect data as authorised by a parent/guardian.

In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site, forms we send to you or by you sending us emails).

MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if

- you made a purchase (class, event or goods) or asked for information from us about our classes, events or goods or
- you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

We do not share your personal data with any third party for their own marketing purposes.

DISCLOSURES OF YOUR PERSONAL DATA

We do not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so..

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under data protection laws, anyone who has data held by an organisation is a “data subject” and has rights regarding how their data is held, used and disposed of. Your rights under the General Data Protection Regulations (GDPR) are listed below:

- The right to be informed – data subjects must be told what personal data is being held, what it is used for and why.
- The right of access – data subjects can see what data of theirs is being processed upon request.
- The right of rectification – if personal data held by organisations is incorrect, they have an obligation to change it.
- The right of erasure – data subjects can demand that personal data held about them is erased where there is no compelling reason for its continued processing.
- The right to restrict processing – data subjects have the right to suppress or block processing of their personal data – for example not using their data for marketing purposes. You can exercise this right by emailing debbie@debbiemillar.co.uk and title you email “Data Restriction Request” including your name and contact details, the reason for your request and how you want us to restrict the processing of your data. We will attempt to action your request as soon as is reasonably practicable thereafter, and in any event within 30 days.
- The right to data portability – at the request of the data subject their data must be able to be moved, copied or transferred from one IT environment to another in a safe and secure way.
- The right to object – if a data subject does not like the way their data is being used they can request that the use is stopped, and that must happen unless there is an overriding legitimate reason to continue using it.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at debbie@debbiemillar.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

COMPLAINTS

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. You can write to us at DMSD, 8 Chapel Croft, Ardleigh, Essex CO7 7TQ or email rc.millar@btinternet.com.

You can make a verbal complaint by contacting Chris Millar on 01206 230806.

THIRD-PARTY LINKS

Our website may (or emails we send) may include links to and from websites of organisations we deal with including clients, suppliers, partner networks, advertisers and associated affiliates. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. DMSD does not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. By using the site you agree to us tracking your actions, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operation to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can set your browser to accept or decline all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

CHANGES TO THIS POLICY

We may need to modify and update the terms of this Privacy Policy to comply with changes to the law or to match our product and service offerings. If a substantial or material change is made to this Privacy Policy and the way in which we intend to use your personal data, we will inform you by email.

Last Modified: August 21st, 2018