

# Cygnets Art School

# GDPR Privacy Policy

Cygnets Art School are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this policy from time to time. By using our website, you are agreeing to be bound by this policy.

Any questions regarding this policy and our privacy practices should be sent by email to the Data Protection Officer at [hello@cygnetsartschool.com](mailto:hello@cygnetsartschool.com) or in writing to Cygnets Art School, Suite 215, 29 Castle Street, Kingston, KT1 1DN. Company Registration Number: 11614216.

All personal data provided by you through our website will be held by Cygnets Art School in accordance with the requirements of the General Data Protection Regulations 2018. This policy was last updated 10th October 2018.

## **How do we collect information from you?**

We obtain information about you when you use our websites to enquire about or purchase our products and services, for example:

- if you register to attend a Cygnets Art School class via our online booking system

- if you make an enquiry or register to attend a Cygnets Art School class via our enquiry form on our contact page or using our email address
- if you register to join our mailing list which includes promotional information about upcoming classes, events, programmes that we run

### **What type of information is collected from you?**

The personal information we collect might include your name, address, email address, your child's name and date of birth, your IP address, and information regarding what pages are accessed and when. If you register your child to attend any Cygnets Art School classes, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

### **How is your information used?**

We may use your information to:

- process your child's Cygnets Art School class, camp or workshop that you have requested;
- process a staff vacancy enquiry;
- carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have opted in to receive and that may be of interest to you, these may include: keeping you informed of useful information about Cygnets Art School, events, activities, campaigns, appeals, fundraising activities, events, campaigns, special offers and promotions.

### **Your choices:**

You have a choice about whether or not you wish to receive information from us. If you opt in to receive news and marketing communications from us about our exciting products and services (e.g. when you

join your child into our programmes, classes or camps) and you subsequently decide you no longer wish to receive our marketing communications, you will have the opportunity to unsubscribe, at any time, from all or options that you feel are no longer relevant to you. All our email communications provide you with a link where you can unsubscribe or update your preferences.

If you have opted in to receive communications from us, we will retain your data on our systems on the basis of consent until you notify us that you wish to unsubscribe from all or any of the various types of communications.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. You can change your marketing preferences at any time by contacting us by email: [hello@cygnetsartschool.com](mailto:hello@cygnetsartschool.com), or by post to Suite 215, 29 Castle Street, Kingston, KT1 1DN.

#### **Your rights:**

We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

#### **The right to access:**

You have the right to ask for a copy of the information Cygnets Art School hold about you (a subject access request), free of charge. If more detailed copies are required, for example specifically knowing what classes your child has attended and when, this may incur an administration fee which will be discussed prior to carrying out the searches.

#### **The right to rectification:**

The accuracy of your information is important to us. If you change your contact details, or any of the information we hold is inaccurate or out of date, please contact us directly.

**The right to erasure:**

In some circumstances you have the right to the erasure of your personal data without undue delay.

Those circumstances include:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent to consent-based processing;
- the processing is for direct marketing purposes;
- the personal data have been unlawfully processed.

However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation;
- for the establishment, exercise or defence of legal claims.

**The right to restrict processing:**

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data;
- processing is unlawful, but you oppose erasure;
- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims;
- you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data.

However, we will only otherwise process it:

- with your consent;
- for the establishment, exercise or defence of legal claims;
- for the protection of the rights of another natural or legal person;
- for reasons of important public interest.

**The right to object to processing:**

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us;
- the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research

purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**The right to data portability:**

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

**The right to complain to a supervisory authority:**

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

**The right to withdraw consent:**

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by contacting us by email at [hello@cygnetsartschool.com](mailto:hello@cygnetsartschool.com) or write to us at: Cygnets Art School, Suite 215, 29 Castle Street, Kingston, KT1 1DN.

**Who has access to your information?**

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

**Third Party Service Providers working on our behalf:**

We do work with third party service providers who we receive data from in order to process your child's space on our programme and shop orders. We may share your information with our third-party service providers, (for example Wix Shoutout and Form Builder) for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service.

Please be reassured that we will not release your information to third parties beyond Cygnets Art School for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**Third Party Product Providers we work in association with:**

We may sometimes work closely with a selected group of third party product and service providers to bring you a range of quality and reliable products and services which we believe may be relevant to your needs e.g. things related to children's activities and interests. Any offers from third parties, will be sent from Cygnets Art School and not the third party. When you enquire about or purchase one or more of these products, the relevant third party product or service provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their privacy policy. These third party product providers may share your information with us, which we will use in accordance with this Privacy Policy.

When you are using our secure online payment pages, your payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets, or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

**Security precautions in place to protect the loss, misuse or alteration of your information:**

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected. When you are on a secure page, a lock icon will appear on the bottom of web browsers or in the search bar, such as Google Chrome or Microsoft internet explorer.

Non-sensitive details (your email address, etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we or our third party service providers have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

**Profiling:**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk. We may need to share your information with credit

reference agencies and other companies to detect and reduce fraud and credit risk and to pursue debtors.

**Links to other websites:**

Our website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

**16 or Under:**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

**Transferring your information outside of Europe:**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

**Review of this policy:**

We keep this policy under regular review. This policy was last updated 10th October 2018.