

Data Protection Policy

Samantha Dene's Dance and Fitness

1. Introduction

Samantha Dene's Dance and Fitness is committed to protecting the privacy, rights and freedoms of all individuals whose personal information we collect and process.

This policy explains how we collect, use, store, protect and dispose of personal data in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, together with other relevant data protection legislation and guidance.

We recognise that we have particular responsibilities when processing information relating to children and young people and will take appropriate steps to protect their personal information.

This policy applies to information relating to children, young people, parents and carers, adult participants, staff, teachers, instructors, volunteers, visitors and other individuals who interact with Samantha Dene's Dance and Fitness.

2. Data Protection Principles

We will ensure that personal data is:

- Processed lawfully, fairly and transparently.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date where necessary.
- Kept for no longer than necessary.
- Kept secure and protected against unauthorised or unlawful processing, accidental loss, destruction or damage.

We will not collect or retain personal information simply because it may be useful in the future.

3. How We Use Personal Data

We collect and process personal information where it is necessary to operate our business safely, effectively and lawfully.

This may include using personal data to:

- Process class, club and event bookings.
- Manage registers and attendance.
- Contact parents, carers and participants regarding classes, cancellations, timetable changes and other essential information.
- Process payments, invoices and refunds.
- Manage staff, teachers, instructors and volunteers.
- Meet safeguarding, health and safety and legal requirements.
- Respond to enquiries.
- Manage customer relationships.
- Provide appropriate support and reasonable adjustments for participants with additional needs or disabilities.
- Maintain appropriate records relating to accidents, incidents, safeguarding and welfare.
- Administer examinations, performances, competitions or other activities where relevant.
- Manage our website, online booking systems and other business systems.
- Send marketing communications where the appropriate consent or other lawful basis exists.

4. Lawful Bases for Processing

We will only process personal data where we have a lawful basis to do so under the UK GDPR.

Depending on the circumstances, this may include:

- **Contract** – where processing is necessary to provide classes, clubs, services or other agreed activities.
- **Legal obligation** – where we are required to keep or provide information by law.
- **Legitimate interests** – where processing is necessary for the legitimate operation, administration and safety of the business, provided these interests do not override an individual's rights.
- **Consent** – where consent is required, such as for certain marketing activities, photographs or other optional uses of personal information.
- **Vital interests** – where processing is necessary to protect someone's life or prevent serious harm in an emergency.

Where we rely on consent, individuals may withdraw their consent at any time, although this will not affect processing that took place before consent was withdrawn.

5. Special Category Data and Additional Needs

Some information we collect may constitute **special category data** under the UK GDPR. This may include information relating to health, disability or certain medical conditions.

For example, we may need information about:

- Medical conditions or allergies.
- Disabilities or additional needs.
- Sensory, communication or learning needs.
- Information required to make reasonable adjustments.
- Information necessary to manage health, safety or safeguarding.

We will only collect and process this information where it is necessary and appropriate for the individual's participation, safety, support or the lawful operation of the business.

Additional-needs information will be treated sensitively and confidentially and will only be shared with individuals who have a genuine need to know, such as relevant teachers or instructors, where this is necessary to provide appropriate support or maintain safety.

We will not use disability or additional-needs information to unfairly exclude or disadvantage an individual.

6. Information We May Collect

Depending on the circumstances, we may collect:

- Names and dates of birth.
- Parent/carer names and contact details.
- Addresses, email addresses and telephone numbers.
- Emergency contact information.
- Medical, allergy, disability and additional-needs information where relevant.
- Attendance and booking information.
- Payment and invoice information.
- Staff and teacher information, including qualifications, DBS information, insurance and relevant employment or self-employment records.
- Information provided through website contact forms.

- Information provided when purchasing products or services through our website.
- Photographs, videos or other recordings where appropriate permissions have been obtained.
- Information relating to accidents, incidents, safeguarding and welfare.
- Information relating to examinations, performances or competitions where relevant.
- Website and technical information, including information collected through cookies and analytics tools.

7. Children and Young People's Data

As Samantha Dene's Dance and Fitness provides activities for children and young people, we take particular care when processing children's personal information.

We will:

- Collect only information that is necessary and appropriate.
- Communicate primarily with parents or carers where appropriate.
- Take appropriate steps to verify consent or authority where required.
- Explain the use of personal information in clear and accessible language.
- Apply additional safeguards when processing children's information.
- Avoid using children's personal information for unnecessary or unrelated purposes.
- Ensure photographs or videos of children are only used in accordance with our relevant permissions and policies.

Parents and carers should ensure that information provided to us is accurate and kept up to date.

8. Third-Party Services and Data Sharing

We use a number of trusted third-party services to operate Samantha Dene's Dance and Fitness.

These may include:

- **ClassForKids** – for bookings, registers, participant information and communications.
- Payment providers – to process payments securely.
- Email and communication providers – to send business and customer communications.
- Website hosting and website management services.
- Google Analytics or other website analytics services.
- Meta/Facebook advertising and tracking tools, where applicable and where the appropriate consent has been obtained.

- Accounting, invoicing or business administration services.
- Professional advisers, such as accountants, where necessary.

We do not sell personal data.

Where we use third-party service providers, we take reasonable steps to ensure that personal information is handled securely and in accordance with applicable data protection requirements.

We may also share information where necessary:

- To protect a child's or individual's safety.
- To comply with a legal obligation.
- With emergency services or relevant authorities where appropriate.
- Where necessary for safeguarding purposes.
- Where an individual has given appropriate consent.

We will not share personal information unnecessarily.

9. Photographs and Videos

Photographs and videos may be taken during classes, performances, events, clubs or other activities.

Where consent is required, appropriate permission will be obtained before photographs or recordings are used for promotional purposes.

We will take reasonable steps to avoid identifying children by their full names alongside photographs or videos unless there is an appropriate reason and permission has been obtained.

Parents and carers can contact us regarding their preferences or permissions relating to photographs and recordings.

10. Marketing and Communications

We may contact customers regarding the administration of their classes, bookings and services where this is necessary to provide those services.

Marketing communications will only be sent where we have an appropriate lawful basis to do so.

Individuals may opt out of marketing communications at any time.

Opting out of marketing communications will not prevent us from sending essential information relating to bookings, classes, payments, safeguarding, health and safety or other necessary business communications.

11. Cookies and Website Analytics

Our website may use cookies and similar technologies to operate effectively, understand website usage and improve the user experience.

We may use analytics and marketing technologies, such as Google Analytics and Meta technologies, where applicable.

Where consent is legally required for non-essential cookies or tracking technologies, we will obtain consent before using them.

Users may manage their cookie preferences through the mechanisms provided on our website.

12. Data Security

We take reasonable and appropriate technical, physical and organisational measures to protect personal information.

These may include:

- Password-protected systems.
- Appropriate access controls.
- Secure electronic storage.
- Secure transfer of information.
- Limiting access to personal data to individuals who need it for legitimate purposes.
- Secure disposal of paper and electronic records.
- Regular review of access permissions.
- Changing or removing access when staff or contractors leave the organisation.
- Keeping devices and software appropriately protected and updated.

No method of storing or transferring information can be guaranteed to be completely secure. However, we will take reasonable steps to protect the information in our care.

13. Data Breaches

A personal data breach may include the accidental or unlawful loss, destruction, alteration, disclosure of or access to personal data.

If a data breach occurs, we will:

1. Assess and contain the breach as soon as possible.
2. Establish what information has been affected.
3. Assess the potential risk to individuals.
4. Take steps to reduce or prevent further harm.

5. Report the breach to the **Information Commissioner's Office (ICO)** where required by law.
6. Notify affected individuals where required by law and where appropriate.
7. Keep an appropriate record of the breach and actions taken.

Where a breach is reportable to the ICO, the applicable reporting requirements, including the 72-hour timeframe, will be followed.

14. Data Retention

We will retain personal information only for as long as it is necessary for the purpose for which it was collected, unless we are legally required or permitted to retain it for longer.

Different types of records may have different retention periods.

For example, certain financial, accounting, safeguarding, accident, insurance or legal records may need to be retained for longer than ordinary customer information.

We will maintain appropriate retention arrangements and securely delete or destroy information when it is no longer required.

The end of a participant's attendance at Samantha Dene's Dance and Fitness does not automatically mean that all of their information can be deleted immediately, as some records may need to be retained for legal, safeguarding, insurance or other legitimate reasons.

15. Individual Rights

Depending on the circumstances and subject to applicable legal exemptions, individuals have rights under the UK GDPR, including:

Right to Be Informed

Individuals have the right to understand how their personal information is collected and used.

Right of Access

Individuals may request a copy of the personal information we hold about them.

Right to Rectification

Individuals may request that inaccurate or incomplete personal information is corrected.

Right to Erasure

Individuals may request deletion of their personal information in certain circumstances. This right is not absolute and information may need to be retained where there is a legal or legitimate reason to do so.

Right to Restrict Processing

Individuals may request that we restrict how their personal information is processed in certain circumstances.

Right to Data Portability

Where applicable, individuals may request their personal information in a structured, commonly used and machine-readable format and may ask for it to be transferred to another organisation.

Right to Object

Individuals may object to certain types of processing, including direct marketing.

Rights Relating to Automated Decision-Making

We do not currently use solely automated decision-making that produces legal or similarly significant effects on individuals.

Requests relating to personal data will be considered and responded to within the applicable legal timeframe.

16. Confidentiality

Staff, teachers, instructors, volunteers and other individuals who have access to personal information are expected to maintain appropriate confidentiality.

Personal information, particularly information relating to children's medical needs, disabilities, additional needs and safeguarding, will only be shared where there is a legitimate reason to do so.

Confidentiality will not prevent information being shared where necessary to protect a child or individual from harm or where disclosure is required by law.

17. Data Protection Queries and Complaints

Individuals who have questions or concerns about how their personal information is being handled should contact:

Samantha Dene's Dance and Fitness

Email: samanthadenes@outlook.com

We will seek to resolve concerns promptly and fairly.

Individuals also have the right to raise concerns with the **Information Commissioner's Office (ICO)** where they believe their personal data has not been handled in accordance with data protection law.

18. Data Controller

Samantha Dene's Dance and Fitness is responsible for deciding how and why personal data is processed for the purposes described in this policy.

This policy will be reviewed regularly and updated where necessary to reflect changes in legislation, guidance, technology and our services.