

PRIVACY POLICY

PLEASE READ THIS POLICY CAREFULLY. IF YOU DO NOT ACCEPT THESE TERMS, YOU ARE ADVISED NOT TO USE THE WEBSITE

This Privacy Policy was last updated: 27/5/24

1. POLICY ACCEPTANCE

This Privacy Policy applies to the website www.bookandball.co.uk (“website”) operated by Book and Ball (“Book and Ball”) and shall include all personal data processed by us through direct mail, telephone or social media channels. Any reference to “you” or “your” means you, the user.

Your acceptance of the policy is deemed to occur upon your first use of the website. You are required to read and accept this Privacy Policy when you engage with us.

Book and Ball may change this policy from time to time by updating this page. On each visit to the website you should refer to this page to ensure that you are aware of and accept any changes.

2. POLICY STATEMENT

Book and Ball, and all franchisees operating under our branded name, recognises the trust you place in us when you share personal data with us. We are committed to being open, honest and transparent with our use of personal data.

This Privacy Policy provides you with details of the personal data we collect when we engage with you, how we will use and look after your personal data, your privacy rights and how the law protects you. The policy covers practises for collecting and processing personal data from carers, prospective teachers and other third parties as identified in the Privacy Policy.

We will take all reasonable steps to ensure that personal data is safeguarded and kept in accordance with data protection law. By providing us with your data, you warrant that you are over 18 years of age.

3. ABOUT US

Book and Ball is a registered Data Controller and each franchise ascribes to adhere to and act upon our obligations under applicable data protection law. Our registration with the Information Commissioner’s Office (ICO) is number C1499523.

For issues relating to data protection the person responsible at Book and Ball is James Taylor. For all data protection matters you should contact us by email to jamie@bookandball.co.uk

4. WHAT PERSONAL DATA DO WE COLLECT?

Personal data is any information relating to an identified or identifiable individual. It does not include anonymous data. We may collect, use, store and transfer different kinds of personal data about you when we engage with you. This may include:

- (a) Identity Data - title, first name, last name, date of birth or similar identifiers. If you interact with us through social media, this may include your social media user name;
- (b) Contact Data - billing address, delivery address, email address and telephone numbers;
- (c) Financial Data – bank account and payment card details;
- (d) Transaction Data - details about services you have purchased from us;
- (e) Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- (f) Profile Data – your username and password, purchases or orders made by you, your interests, preferences, images and videos uploaded, qualifications and references, reviews;
- (g) Geographical Data - information setting out your primary address to control the use of location services in most mobile devices and desktop settings;
- (h) Usage Data - information about how you use our website and services;
- (i) Marketing and Communications Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

5. HOW DO WE COLLECT PERSONAL DATA?

We use different methods to collect data from and about you, through:

Emails

We retain copies of emails sent to us and any personal data will be held in accordance with this Privacy Policy on the basis of being to fulfil an order or as legitimate to our business interests.

Subscription to our Newsletters

If you subscribe to our newsletters via the website, we will keep details of your name and email for this purpose on the lawful basis of your consent. You will be able to unsubscribe (or withdraw your consent) from receiving these by clicking on a link for that purpose at the bottom of our e-mail with the newsletter at any time. Newsletters are normally sent to registered subscribers on a monthly basis.

Telephone calls

Calls to us may be recorded and any data relating to the call may be retained by us. The data will be held on the basis of being for our legitimate business needs or in order to fulfil our contractual obligations if you are a client of ours.

Applications

We will ask for personal details from teachers applying to run Book and Ball classes and will also collect personal data from third parties in relation to an engagement for services, such as character references and verifying an applicant's identity. Personal data is processed on the lawful basis that it is used to enter into a contract with the applicant.

Other direct interactions

You may give us your data by filling in forms or by corresponding with us face-to-face, by post, or through social media. This includes personal data you provide when you: sign up to receive our services; make enquiries or request information be sent to you; use our services; ask for information to be sent to you; engage with us on social media; enter a promotion or survey; contact us direct; or leave comments or reviews on our services.

Social media

We use social media to engage with users and link to our Facebook, Twitter and Instagram pages. We do not keep any specific data that identifies you as an individual user but hold details of our followers on these platforms. You should refer to the Privacy Policies of these channels to understand how they treat your data in relation to linking to our site.

Facebook: <https://www.facebook.com/privacy/explanation>

Twitter: <https://twitter.com/en/privacy>

Instagram: <https://wellbeing.instagram.com/safety>

If you send us a direct message via social media, the details may be retained by us only as relevant to any ongoing contract or to further our legitimate business interests or as required for legal purposes. The third-party provider may also retain details in accordance with their Privacy Policy.

Reviews

We may ask for a review of our services and these may be published on our website or social media. Reviews are collated in many ways, including, via email, social media, Google and in person.

Visits to our website

When you visit our website, we do not attempt to identify you as an individual user, and we will not collect personal data about you unless you specifically provide this to us.

As you interact with our website, technical data may be automatically processed through the use of Cookies and Analytics, details of which are explained in our Cookie Policy.

Special categories of data

We do not generally collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Special categories of personal data will only be processed with explicit consent.

Children

We do not market this website at those under 18 years old. Consistent with the GDPR we will never knowingly request personally identifiable information from anyone under the age of 16 years old.

We will only process data relating to children for the purpose of running Book and Ball classes and with the consent of the carer/person with legal responsibility. We take appropriate steps to ensure that children's personal data is safeguarded and kept confidential.

6. INFORMATION WE GET FROM OTHER SOURCES

From time to time, we may need to obtain information from third parties about you. This will only apply where it is necessary to provide our services and as permitted by law.

We may receive personal data relating to your identity and contact data from data partners; and data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites.

7. HOW WE USE YOUR DATA

UK data protection law requires us to have a “legal basis” for processing personal data. The legal bases we rely on are:

- Performance of a contract we are about to enter into or have entered into with you;
- Compliance with a legal or regulatory obligation;
- Carrying out activities that are legitimate to our business interests;
- Consent. However, generally, we shall not rely on consent as a legal basis for processing your personal data other than where the law requires it. Where our legal basis is consent, you have the right to withdraw consent any time.

We may use the personal data we collect from you:

- To register you for Book and Ball classes.
- To provide, manage and personalise our services to you and respond to communications.
- To administer and improve the website.
- To send email notifications which have been specifically requested.
- To send marketing communications where expressly agreed e.g. newsletters.
- To provide third parties with statistical information about our users.
- To ask for a review of our classes.
- To deal with enquiries and complaints relating to the website.
- To administer the application process for engaging franchisees and teachers.

Users contacting this website and/or its owners do so at their own discretion and provide any such personal data requested at their own risk. Your personal data is kept private and stored securely until a time it is no longer required or has no use.

Our legitimate interests

When we use our legitimate interests as the legal basis for processing your personal data, we will consider and balance any potential impact on you and your rights before we process your personal data. We will only then proceed where we believe our interests are not overridden by the impact on you. Our legitimate interests include the management of our business operations.

8. SHARING INFORMATION

Disclosure

We do not share, sell, or distribute your data to third parties, except as contractually agreed with you, such as with our franchisees and teachers, or as stated in this Privacy Policy. We may disclose your personal data if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend our legal rights, or if otherwise legally permitted.

Disclosure to Franchisees

Personal data will be shared with the franchisees and those working on their behalf so that they can communicate with you about Book and Ball classes. All franchisees are data processors and are required to safeguard your personal data in accordance with relevant data protection legislation. Franchisees and Teachers must agree to a Data Processing Agreement which outlines their responsibilities as a Data Processor including the duty to cooperate with Data Controller.

If a franchise is sold to another party, certain personal data will be disclosed to them to enable them to provide services under any existing contracts. They will also have use of the personal data for lawful business purposes. All potential or new franchisees must adhere to a confidentiality agreement with us and comply with relevant data protection legislation.

Data Processors

We may use Data Processors who act on our instruction in relation to the management of your data. All Data Processors who provide services to us are required to adhere to data protection laws and regulations and must only use personal data on the lawful basis for which it is collected. Data Processors are required to sign a Data Processing Agreement with us to ensure that they comply with their obligations under the GDPR. You will be informed of any other Data Controllers who have access to your data and who may determine processing activities separately to us, or as a Joint Data Controller.

Marketing

We may carry out direct marketing by email, phone, text or post where we have a lawful basis to do so.

We will ask for your consent to receiving marketing communications (including newsletters) at the time of registration and you have the option not to give consent and to withdraw consent given at any time. You may withdraw your consent for us to contact you by email to leanne@dramatots.co.uk. We may continue to contact you for non-marketing purposes if there is another lawful basis to do so.

Non-personally identifiable information may be provided to other third parties for marketing, advertising or other uses.

External links

Users of the website are advised to adopt a policy of caution before clicking on any external web links. Clicking an external link will take the user away from our website. Once you leave our website or are redirected to a third-party website, plug-in or application, you are no longer governed by this Privacy Policy or our website's terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. Book and Ball and its owners cannot be held liable for any damages, or the consequences of visiting any external links.

Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

Book and Ball uses social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised that before using such social sharing buttons, that they do so at their own discretion, and should consider that the social media platform may track and save requests to share a web page, through the users' social media platform account.

Bookings and Payment processing

All bookings for our classes are made through email and customers are required to make payments via bank transfer. Personal data is safeguarded and handled in accordance with recognised industry standards that comply with data protection law including the GDPR.

9. DATA RETENTION

We keep your personal data in accordance with our Data Retention Policy which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations. The need to hold information is regularly reviewed and data will be disposed of when no longer required.

10. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such system and are required to keep the information confidential.

We take appropriate steps to ensure a safe processing of personal data, however, we cannot guarantee the security of data transmitted through our website or by email. Any transmission is at your own risk.

11. DATA STORAGE

Any information that you supply to us may be stored and processed on servers outside of the European Economic Area (EEA). When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy as required by applicable law.

- In the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield; or
- In the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with them.

12. RIGHTS OF DATA SUBJECTS

Book and Ball recognises a data subjects rights and will uphold these in accordance with data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for

your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Subject access requests

You have the right to ask for a copy of the information that we hold about you by email to jamie@bookandball.co.uk. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information. In limited circumstances a fee may apply.

Right to rectification

Data subjects have the right to request that personal data is amended or changed if it is inaccurate or incorrect. We act on any such request without delay.

Right to erasure

Data subjects have the right to ask us to delete personal data from our systems without giving any reason and at any time. We act on any such request without delay.

Right to restrict processing

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

- Personal data is not accurate;
- The processing of data is unlawful;
- Data is required to exercise legal rights or defend legal claims;
- Data is unlawful, although there may be lawful grounds for processing, which override this right.

Right to data portability

Data subjects have the right to obtain and request the transfer of their data to different service providers.

Right to object

Data subjects have the right to object to the processing of personal data at any time based on their particular situation. This includes objecting to profiling unless it is in the 'public interest' or exercised lawfully by an official authority. We will only process data under lawful grounds.

Right not to be subject to decisions based on automated processing

We do not use any automated processing that results in any automated decision based on a data subject's personal data.

Using your rights

If you wish to invoke any of these rights, you should contact the person responsible for data protection by email to jamie@bookandball.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. Alternatively, we may refuse to comply with your request in these circumstances.

In some circumstances your rights may be limited or conditional. We will let you know if this applies to any request we receive from you in relation to the aforementioned rights.

13. DATA BREACHES

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that there is an actual, or possibility, that data within our control including the control of our data processors, has been compromised. If the breach is classified as 'high risk' we will notify all data subjects concerned using an appropriate means of communication. We will report any relevant breaches to the ICO, see below.

14. CHANGES TO OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

15. REPORTING COMPLAINTS

If you want to raise a concern about the use of your data, you can contact us by email to Jamie@bookandball.co.uk

Alternatively, you can formally raise a concern or complaint to the Information Commissioner's Office (ICO), the UK regulatory authority for data protection:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire , SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns>

2024 Book and Ball