**UK GDPR Website Privacy Notice**

1. Welcome to Show Stars Theatre Company's privacy policy.
2. Show Stars Theatre Company Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.
3. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.
4. Important information and who we are
	1. Purpose of this privacy policy
		1. This privacy policy aims to give you information on how Show Stars Theatre Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to classes purchase a product.
		2. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.
	2. Controller

Show Stars Theatre Company is the controller and responsible for your personal data (collectively referred to as "Show Stars", "we", "us" or "our" in this privacy policy).

* 1. Contact details
		1. If you have any questions about this privacy policy or our privacy practices, please contact our Director on 07474001107 or via info@showstarstheatrecompany.co.uk.
		2. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.
	2. Changes to the privacy policy and your duty to inform us of changes
		1. We keep our privacy policy under regular review.
		2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
1. The data we collect about you
	1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
	2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
		1. Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
		2. Contact Data includes billing address, delivery address, email address and telephone numbers.
		3. Financial Data includes bank account and payment card details.
		4. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
		5. Safeguarding Data includes details about a child’s personal circumstances relating to family or health matters.
	3. We may also collect Special Categories of Personal Data about (this includes details about a child’s medical conditions).

**If you fail to provide personal data**

* 1. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.
1. How is your personal data collected?
	1. We use different methods to collect data from and about you including through:
		1. Direct interactions. You may give us your Identity, Contact and Financial Data, Medical Data, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
			1. Sign up for classes or for our products or services;
			2. Purchase items through our shop on our website;
			3. give us feedback or contact us.
	2. Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies We may also receive Technical Data about you if you visit other websites employing our cookies.
	3. Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:
	4. Technical Data from the following parties:
		1. analytics providers such as Google based outside the UK;
		2. search information providers such as Google based outside the UK.
		3. Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Wix.com Limited (our website provider) based inside the UK.
2. How we use your personal data
	1. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
		1. Where we need to perform the contract we are about to enter into or have entered into with you.
		2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
		3. Where we need to comply with a legal obligation.
	2. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before:
		1. Using photographs of glasses for our marketing purposes; or
		2. sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

* 1. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
	2. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new customer | (a) Identity (b) Contact(c) Medical information(d) Safeguarding  | Performance of a contract with youNecessary for our legitimate interests (to ensure health and safety) |
| To deliver classes to you | (a) Identity (b) Contact(c) Medical information(d) Safeguarding  | Performance of a contract with youNecessary for our legitimate interests (to ensure health and safety) |
| To process and deliver your order including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)  | (a) Identity(b) Contact(c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical  | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage  | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications | Necessary for our legitimate interests (to develop our products/services and grow our business) |

**Third-party marketing**

* 1. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**Opting out**

* 1. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
	2. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

**Cookies**

* 1. You can set your browser to refuse 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.
	2. You can manage cookies through your browser.
	3. Only people who have authorisation are allowed access to the information you provide. We do not share any information with outside parties. Where you provide an email address, for instance, we will use that address to reply to your email.
	4. As a responsible company working with children, we take care to keep all information secure. We do not collect information from children under 18 years of age. You are able to access the information we have and we will always immediately correct any errors you point out to us. If you do wish to access information on the data we hold, you will be required to verify details that we hold about you.
	5. This website, www.showstarstheatrecompany.co.uk (the “Website”), is operated by Show Stars Theatre Company Ltd.
	6. This agreement sets out our COOKIE POLICY that will govern the relationship between us, Show Stars Ltd and you, the Parent/Guardian.

**What Are Cookies?**

* 1. Cookies are small text files that are stored in your web browser that allow Show Stars or a third party to recognise you. Cookies can be used to collect, store and share bits of information about your activities across websites, including on the Show Stars website and subsidiary brand websites.
	2. Cookies Can Be Used For The Following Purposes:
		1. To enable certain functions
		2. To provide analytics
		3. To store your preferences
		4. To enable ad delivery and behavioural advertising

**Show Stars Uses Both Session Cookies And Persistent Cookies.**

* 1. A session cookie is used to identify a particular visit to our Website. These cookies expire after a short time, or when you close your web browser after using our Website. We use these cookies to identify you during a single browsing session.
	2. A persistent cookie will remain on your devices for a set period of time specified in the cookie. We use these cookies where we need to identify you over a longer period of time. For example, we would use a persistent cookie for remarketing purposes on social media platforms such as Facebook advertising or google display advertising.

**How Do Third Parties Use Cookies On The Show Stars Website?**

* 1. Third party companies such as analytical or ad networks generally use cookies to collect user information on an anonymous basis. They may use that information to build a profile of your activities on the Show Stars Website and other websites that you’ve visited.
	2. If you do not wish to allow cookies to track or collect information, or wish to manual exclude the ability of certain types of cookies, you can change your browser’s settings to delete cookies that have already been set and to not accept new cookies. To learn more about how to do this, visit the help pages of your chosen browser.
	3. Please note, if you delete cookies or do not accept them, your user experience may lack some of the features we offer, you may not be able to store your preferences and some of our pages might not display properly.
	4. For more information on cookies, please visit the information commissioner’s office (‘ICO’)

**Change of purpose**

* 1. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
	2. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
	3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
1. Disclosures of your personal data
	1. We may share your personal data with the parties set out below for the purposes set out in the table above.
		1. External Third Parties as set out in the Glossary.
		2. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
	2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
2. International transfers
	1. We do not transfer your personal data outside the UK.
3. Data security
	1. 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, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
	2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
4. Data retention

**How long will you use my personal data for?**

* 1. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.
	2. In some circumstances you can ask us to delete your data.
	3. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.
1. Your legal rights
	1. Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click [here](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-of-access/) to find out more about these rights:
	2. If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required**

* 1. 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 could refuse to comply with your request in these circumstances.

**What we may need from you**

* 1. 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.

**Time limit to respond**

* 1. We try to respond to all legitimate requests within one month. Occasionally it could 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 and keep you updated.
1. Glossary

**LAWFUL BASIS**

* 1. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
	2. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
	3. Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**THIRD PARTIES**

* 1. External Third Parties
		1. Service providers acting as processors based in the UK who provide website administration service (Wix.com Limited).
		2. Schools who we provide classes through.
		3. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
		4. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
		5. Social media platforms who we use for advertising purposes (e.g. Instagram, Facebook)

**YOUR LEGAL RIGHTS**

* 1. You have the right to:
		1. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
		2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
		3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
		4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
		5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
			1. If you want us to establish the data's accuracy.
			2. Where our use of the data is unlawful but you do not want us to erase it.
			3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
			4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
	2. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
	3. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.