

# withSoniaBrown

## PRIVACY NOTICE

withSoniaBrown takes your privacy very seriously and are committed to protecting and respecting your privacy. Please read this policy carefully to understand our views and practices regarding your personal information.

### Who we are

withsoniabrown collect, use and are responsible for certain personal information about you. Our contact details are: withsoniabrown, 8 Selkirk House, Kingman Way, Newbury, Berkshire RG14 7GP. [www.withsoniabrown.com](http://www.withsoniabrown.com) 07865 506282 email [Sonia-brown@live.co.uk](mailto:Sonia-brown@live.co.uk)

### Personal information we collect and use

We will ask you to provide on registration with us via the [www.withsoniabrown.com](http://www.withsoniabrown.com) website.

- First name
- Surname
- Address
- Email address
- Phone number
- Emergency contact
- Medical Conditions that we should know about
- How you heard about the class

If you give us information about another person (Emergency Contact details), you confirm that the other person has agreed that you:

- Consent on their behalf to the processing of their personal data
  - Shall receive and data protection notices on their behalf
  - Shall consent on their behalf to the processing of their sensitive personal data
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- We may also ask for your image for a record of an occasion, performance, or class. Individuals will be invited to opt out prior to the recording should they wish not for their image to appear on social media or for marketing purposes. The images will not be linked to personal information without prior consent.
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- **Cookies and similar technologies**

A cookie is a small text file which is placed onto your computer or electronic device when you access our website. Similar technologies include web beacons, action tags, locals shared objects ('flash cookies') and single-pixel gifs. Such technologies can be used to track user's actions and activities, and to store information about them. We use these cookies and/or similar technologies on this website.

For example, we may use cookies to monitor and/or collect information such as how many times a user accesses the website.

The information helps us to build a profile of our users. Some of this information may be aggregated or statistical, which means that we will not be able to identify you individually. On the first occasion that you use our site we will ask you whether you consent to our use of cookies. If you do not, cookies will not be used. Thereafter you can opt-out of using cookies at any time or you can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

### **How we use personal information**

- Communication with students via email, telephone, text message or social media - regarding classes, events, news, and other activities
- Management of classes - numbers, registration and waiting lists
- Medical emergencies
- Invoicing and accounting
- Marketing (images with permission) – via social media, tv, radio, press and leaflets
- Processing customer enquiries
- Covid 19 Track and Trace.

You can opt out of receiving the communications and participating in marketing at any time, by contacting withsoniabrown on contact details above, or remove oneself from the social media group. Individuals are only added to social media groups only upon request.

### **Sharing your personal information**

Your personal information will be treated as strictly confidential and will only be shared with a third party if required to do so with your prior permission. For example, a performance programme.

### **How long your personal information will be kept**

We keep your personal information for no longer than reasonably necessary. The information will be held for 6 years after the first payment to withsoniabrown to satisfy UK tax law.

These processes will be reviewed every two years.

### **Reasons we can collect and use your personal information**

We rely on the following as the lawful basis on which we collect and use your personal information

- Consent of the data subject (the student) – the information is provided willingly to enable enrolment and ongoing class attendance.
- Contract between the data subject (the student) and withsoniabrown – delivery of dance class in return for payment.
- Explicit information for the activity being undertaken to be modified where necessary

## **Providing us with your personal information**

Although you are under no statutory or contractual requirement or obligation to provide us with your personal data, enrolment cannot be completed until the information is provided.

## **Keeping your information secure**

At withsoniabrown your personal information is only accessible to authorised personnel who are subject to a duty of strict confidentiality. Appropriate security (technological and organisational) measures are in place to prevent that information from being accidentally lost, used or open to unauthorised access.

While we will use all reasonable efforts to secure your personal data, in using our website and social media you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet.

Should we suspect we suspect a data security breach, we will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you have any concerns about your information, please contact us using the details above.

## **Transfers of your information out of the EU**

We will not transfer your personal information outside of the European Union at any time.

## **Children and the validity of consent**

We will take reasonable steps to ascertain that users are over 18 years of age and whether a child of 13 years or more is sufficiently informed to give valid consent. If the user is not, parental consent will be required to provide consent for the processing of any personal information.

## **Your rights and your personal data**

Under the General Data Protection Regulations, you have rights:

- Right to be informed - transparency of what and how we use your personal information
- Right of access - copies of the personal information that we hold can be requested
- Right of rectification – inaccurate or incomplete information must be amended.
- Right to be forgotten - in certain situations individuals can request that their data can be erased
- Right of portability – individuals can request that the information hold on them to be transferred to another company.
- Right to restrict processing – individuals can request that the organisation limits the way it uses personal data.
- Right to object – individuals can challenge certain types of processing i.e. direct marketing.

- Rights related to automated decision-making including profiling – if an individual feels that its data is being used unlawfully by automated processing activities it may request a copy of those activities.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioners Office (ICO) on individual's rights under the General Data Protection Regulations <http://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **If you would like to exercise any of these rights**

To exercise all relevant rights, queries or complain please in the first instance contact: Sonia Brown on email [Sonia-brown@live.co.uk](mailto:Sonia-brown@live.co.uk) with:

- Identifying information
- Proof of your identity (copy of your driving licence, passport or a recent credit card/utility bill).
- The information that you require.

If your complaint is not resolved to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#)

### **Further processing**

We may wish to use your personal data for a new purpose not covered by this Privacy Notice, prior to the commencement of the new processing a new Notice will issued with relevant purposes and processing conditions.

### **Changes to our Privacy Notice**

Any future changes to our Privacy Notice will be posted on this web page, and where appropriate, you will be notified by email. Please check this page regularly for updates and changes.