

# AmaSing Projects CIC Privacy Policy

## Introduction

AmaSing Projects CIC is committed to protecting your personal data. As a community interest company it is necessary for us to collect, store and process personal data about our customers, suppliers, and other third parties who we engage with to provide services for us or with whom we do business. This Privacy Policy gives you detailed information on when and why we collect your personal data, how we use it and how we keep it secure.

With the introduction of the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the Data Protection Act 2016 (DPA), the way personal data is kept and used by businesses has come under much greater scrutiny. This Privacy Policy is therefore very important to us and sets out how we will process personal data we collect from, or is provided by, data subjects and others on their behalf.

This Privacy Policy sets out how we comply with our legal obligations when processing personal data and enables individuals about whom we hold data to have confidence in us. It is important that you read this Privacy Policy. This Privacy Policy may be amended at any time so please check back to this page from time to time. We may also inform you of any changes where we hold an appropriate email address for you. This Privacy Policy was updated in April 2019.

## Contact Information

AmaSing Projects CIC ('AmaSing') is a limited company incorporated in England and Wales (Company number 10723343).

If you have any questions regarding how we use your personal data, please contact us at:

Address: 91 Woodlands Drive, Hoole, Chester, CH2 3QJ

Telephone: 07832 139647

Email: rach@amasing.org.uk

## What do the terms used in this Privacy Policy mean?

There is likely to be a lot of data protection terminology that you may be unfamiliar with and which has a specific meaning under data protection legislation. The terms that are used most frequently include:

**Data subject** means a living individual about whom we hold personal data. A data subject need not be a UK national or resident.

**Data controller** is a term used to describe the people who, or organisations which, determine the purpose and manner for which any personal data is processed. AmaSing is a

data controller of the personal data used in our business for commercial purposes.

**Data processors** means any person or organisation that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition, but it could include suppliers, administrators and teachers who handle personal data on behalf of the data controller.

**Personal data** means data relating to a data subject who can be identified (directly or indirectly) from that data (or from that data and other information in our possession or available to us). Personal data can be factual (e.g. a name, address, date of birth or a photograph etc.) or it can be an opinion about that data subject, their actions and behaviour.

**Processing** is a term used to describe what we do with the data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring (or disclosing) personal data to third parties.

**Special categories of personal data** is a term used to describe sensitive personal data such as information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, genetic data and biometric data where processed to uniquely identify a person or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions.

### **How we collect your personal data**

Generally, we collect your information when you decide to interact with us. This could include you sending us your details online, over the phone or in person. We collect information in a number of ways which are listed below:

1. When you use our website to enrol your child, pay fees, register for an event or enquire about our services.
2. When you contact us by phone to enrol your child, register for an event or enquire about our services.
3. When you contact us by post.
4. When you visit our website we use cookies to help make the experience of using our website better and to personalise the service you receive from us – this means we will remember your previous visits and track the pages on our website that you visit. For more information please see our Cookie Policy.
5. From time to time, we may also get data about you from third parties – please see the 'How we may use your information' section for more details. This could include data obtained by a supplier or where you have participated in a survey or event.
6. You may provide us with information to be used in connection with a show or performance.

### **The type of personal data we collect**

We only collect the information that's necessary to carry out our business, provide the particular service you've requested and/or to keep you informed. There are occasions when you can choose not to give us certain information, but this may limit the level of personalisation we can offer, for example, you may not get to hear about an event you would have loved to have participated in or attended.

In some circumstances we will request your consent to use certain information for specified purposes. In such circumstances you will have the free choice to give, refuse or withdraw consent. In the case of personal data relating to a child under the age of 16, we will require the consent of a parent or legal guardian. Individuals aged 16 or over may give, refuse or withdraw consent (whether the consent was originally given by themselves or on their behalf) themselves.

The type of information we collect depends on where and when it is gathered:

### **Information we obtain directly from you:**

When you register on our website or contact us to enquire about a service, to enrol your child to register or attend an event, by post or phone we need to collect information from you in order to provide the service you are requesting.

We may collect:

- Your Name
- Your Child's Name
- Gender
- Your Child's Gender
- Your E mail Address
- Your Child's Date of Birth
- Contact Phone Number(s)
- Payment Details
- Your Child's Medical Information
- Address(es)

### **When visiting our website we may collect the following information:**

Automatically populated IP address: a public IP address is a unique number which allows a computer, group of computers or other internet connected device to browse the internet. The log file records the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version. This information is collected to help diagnose and manage the website, to audit the geographical makeup of users, and to establish how they have arrived at the website. This is known as a cookie.

For further information about Cookies and how AmaSing uses them, please read our Cookie Policy.

### **Information we obtain independently from you:**

Your information may be shared with us by independent organisations, for example other Arts bodies and workshop organisers that AmaSing has worked with. These independent organisations will only do so when it is required to complete a contract and/or when you have indicated your consent. You should check their privacy policy when you provide your information to understand fully how they will process and safeguard your personal data.

### **Third Party Organisations:**

We may combine information you have given to us with this additional information available from external sources such as Schools. This will only be done when you give permission to the relevant third party organisations to share the data they hold on you, or if the data is already publicly available.

### **Information available publicly:**

We may include information published in articles / or newspapers or on freely accessible social media platforms.

### **Why we collect your personal data and how we use it**

The information we hold on you will be used in a number of ways. Here are the main ones: to provide a service you have requested, offer you a personalised experience and understand your needs better, inform you of events or updates you've asked for or contact you if we need to obtain or provide additional information.

Specifically, we use your information we collect in the following ways:

To carry out our business and to provide a service or fulfil a contract with you:

- To fulfil enrolment, registration and information requests.
- Medical details are obtained to enable us to fully support your child's welfare in setting.
- Provide the best possible customer services and to help us with internal administration.
- Contact you with important information relating to your registration, such as confirming your request, reminding you of an upcoming event or letting you know about changes to the service.

Where we have your consent:

- Send you updates via email about upcoming events and opportunities that we think may be of interest to you.
- Email you about a specific topic you've requested to hear more on such as particular workshops.
- Share your details with other performance arts-based organisations who collaborate with AmaSing. These organisations will contact you to let you know how they collected your

data and to check that you're still happy to hear from them. You will always be able to opt out of their communications by contacting them directly.

- Use your personal data (or that of your child) in our marketing campaigns.

Where we have justifiable reason (including legal obligation and legitimate interest):

- Learn about your interests and preferences so that we can contact you with information that is relevant to you.
- Help us target our marketing communications and adverts so that they're more relevant to you.
- Use your pseudonymised details to show you advertising on such Social Media platforms as Facebook and Instagram or through other third party advertising that may appear on other websites you use. The information shared with these platforms is pseudonymised to protect your personal data.
- Measure and understand how our audiences respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective.
- Undertake user research: we may contact you to ask you to participate in user research either via an online or telephone survey or in person. You are under no obligation to participate in research and, should you provide any further information, AmaSing will inform you how any further information will be used.
- Analyse and continually improve the services we offer including our website and our other products.
- To help us run the test version of our website that we use internally to pilot new features and ensure the smooth running of our web services.

### **How we process your personal data**

AmaSing will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent.

Some of our service providers may have access to your data in order to perform services on our behalf. We make sure anyone who provides a service for AmaSing enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

We may share your details with:

- Service providers who work on behalf of AmaSing for the performance of any contract we enter into with them or you, for example, clothing providers, printers and mailing houses, marketing agencies, database services, website hosting or email delivery services.
- Other organisations such as event organisers, photographers and survey providers etc. if you choose to take part in such activities that need administration by third parties and you choose to opt in for contact from those organisations.
- Third party data services who help us to segment and understand our audience by providing additional information so that we can send the most relevant and targeted communications possible.

- Third party advertisers (such as Facebook or Google) to help us identify customers similar to our audience or to serve relevant adverts to you on third party websites. The information shared with these advertisers is pseudonymised to protect your personal data.
- AmaSing is not responsible for the privacy policies and practices of other websites even if accessed using links from [www.amasing.org.uk](http://www.amasing.org.uk) and recommends that you check the privacy policy of each website you visit and contact its owner or data protection manager if you have any concerns or questions.

Despite all our precautions, no data transmission over the internet is 100% secure. So, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention to the fact that you do so at your own risk.

### **Keeping your personal data secure**

AmaSing is committed to protecting the personal information you entrust to us. We adopt robust and appropriate technologies and policies, so the information we have about you is protected from unauthorised access and improper use.

As part of the services offered to you through the AmaSing website, the personal information you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of the computer servers used to host the website are located in a country outside of the EEA. If AmaSing transfers your personal information outside of the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Policy.

AmaSing may transfer your data to the USA to organisations such as Facebook or Google. The USA has weaker data protection laws than that of the EEA and therefore we will ensure that only organisations who are a part of the EU/US privacy shield initiative will handle your personal information. More details on this certification can be found at [www.privacyshield.gov/welcome](http://www.privacyshield.gov/welcome).

We will keep your information only for as long as is reasonably necessary for the purposes set out in this Privacy Policy and to fulfil our legal obligations. We will not keep more information than we need. The retention period will vary according to the purpose. For example, partially completed registrations or enrolments (12 months), enquiries (12 months), CV's (6 months). For further information about how long we will keep any particular piece of information, please contact us using the contact details outlined in this Privacy Policy.

If you ask us to stop sending direct marketing communications to you, we will keep the minimum amount of information (e.g. name, address or email address) to ensure we adhere with such requests.

### **Your rights**

You should find it easy to access and amend the personal information that we hold on you, or request that we stop contacting you. It's your data and we want to make sure you feel in control of it.

Every email we send to you will include details on how to change your communications' preferences or unsubscribe from future communications. If you would like to see what information we hold, you can request full details.

You can also request full details of personal information we hold about you under the GDPR or the DPA by contacting the Data Protection Manager, Rachael Borman. Please email a description of the information you would like to see, together with proof of your identity to [rach@amasing.org.uk](mailto:rach@amasing.org.uk).

At any time you have the right to ask AmaSing to amend or stop how it uses your personal information including for marketing purposes. You can do this by phoning, emailing or writing using our contact details below. You have the right to get information held about you by us corrected. If you have any concern about the accuracy of your personal data, please let us know using the below contact details. If you would like us to remove the personal information we hold about you, please contact us using the contact details below.

If you have given consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Manager, Rachael Borman at [rach@amasing.org.uk](mailto:rach@amasing.org.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

When dealing with a request from a child relating to any of the above rights, we will need to make a decision on whether the information should be provided to them or to their parents / legal guardian and will be guided by the individual's age at the time of request and their level of understanding about what they are requesting and why. For these purposes, we take the view that most children will reach this level of understanding at around age 16.

You have the right to lodge a complaint with the supervisory authority, The Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk).

By email: Please complete the form at <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**AmaSing Projects CIC**

**April 2019**