**Babyballet Franchisees Privacy Policy**

We babyballet Midlothian, are committed to protecting and respecting your privacy.

We are a franchise business operating under licence from Babyballet Franchising Limited.

This Privacy Policy relates to personal information identifying your or your child.

This Privacy Policy may vary from time to time. We will notify you of any changes as appropriate. For further information see the privacy policy on our Franchisor’s website to which we also adhere [www.babyballet.co.uk](http://www.babyballet.co.uk).

1. **Information we collect**

*Personal data from you:*

* Contact details (e.g. name, address, phone number, email address) when you make enquiries, book or register your child for classes;
* Payment details such as bank account and payment card details for example for parties, shows, mechanises and nurseries;
* Your child’s data of birth;
* Photographs and video footage

*Sensitive personal information:*

* Information about your child’s health including any medical condition, health and sickness records
* Information about your/ your child’s race or ethnicity and religious beliefs

*From third parties:*

* We may receive information about you or your child from our franchisor where you make an enquiry, register or book a class through their website.
1. **How we use your/ your child’s personal data**

*Personal data*

We will only use your personal information when the law allows us to. Most commonly this will be:

1. Where we need to perform the contract we have entered into with you e.g.:
	* To register or book your child onto one of our classes
	* To carry out the services you have requested and/or your child participates in e.g. parties, shows and nurseries
	* To manage our relationship with you
	* To manage payment e.g. when you purchase merchandise
	* To process and deliver your orders
2. Where we need to comply with a legal obligation e.g.:
	* Health and safety legislation
3. Where it is within our legitimate interests and your interests or fundamental rights do not override those interests; e.g.:
	* To provide you with information about events and news
	* To send you communications about changes to our terms and conditions and policies
4. To protect yours or your child’s vital interests e.g.:
	* In an emergency situation
5. Where you have given us your explicit consent e.g.:
	* Where we would like to use photos or images taken of you or your child in promotional materials.

*Special categories of personal data*

We will only process this category of data where you have given us your explicit consent and/or it is necessary to protect the vital interests of you or your child e.g. to ensure your child’s health and safety.

We may use this category of information where it is needed in the public interest such as for equal opportunities monitoring.

1. **Disclosure**

We operate as an independent franchise business of babyballet Franchising Limited. It is important for the operation of our business that some of your personal information is transferred between us and babyballet (and vice versa) to enable us to provide our services to you, for example, if you register via the babyballet website. See the Joint Controller Statement on the babyballet website for more information.

We will share your data with our authorised personnel including but not limited to teachers, chaperones and administrative staff. We may also have to share your personal data with (i) service providers who provide IT and system administration support, warehouse suppliers and distributors (ii) professional advisors including lawyers, bankers, auditors and insurers (iii) HMRC and other regulatory authorities (iv) third parties to whom we sell, transfer or merge parts of our business or our assets and/or (v) charities we support as appropriate.

We require all of these third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. **International Transfer**

We do not transfer your data outside the EEA.

1. **Data Security**

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator where we are legally required to do so.

1. **Data Retention**

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting, or reporting requirements so for example we need to keep certain information about you for 6 years after you cease to be a client for tax purposes.

1. **Your rights**

You are able to exercise certain rights in relation to your personal data that we control and process. These are set out in more detail at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You may request that we inform you of the data we hold about you and how we process it. This is your right to a Subject Access request. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the request to midlothian@babyballet.co.uk.

1. **Communication Preferences**

Every marketing email from babyballet Midlothian includes instructions on how to opt-out of receiving further marketing emails from babyballet Midlothian.

1. **Complaints and contact**

All comments, queries and requests relating to our use of your information are welcomed and should be e-mailed or sent to us at midlothian@babyballet.co.uk / 32 Saw Mill, Medway, EH19 3FX.

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([*www.ico.org.uk*](http://www.ico.org.uk/)).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.