

DATA PROTECTION POLICY

Introduction

AfreakA Aerials LLP ('the Partnership') is a limited liability partnership run for the following purpose:

Providing Aerial and Circus based sport/fitness classes to allow students to develop themselves and have the opportunity to perform in a safe and inclusive environment.

The Partnership conducts its business at OXSRAD, Court Place Farm, Marsh Lane, Marston, Oxford, OX3 0NQ.

The registered office of the Partnership is 22 Broadhurst Garden, Littlemore, Oxford, OX4 4YQ.

The Partnership is registered in England at Companies House number: OC385136.

The Partnership has adopted this data protection policy and expects every adult working or helping at the Partnership to support it and comply with it. Consequently, this policy shall apply to all partners, instructors (directly employed or contracted), volunteers, students or anyone else working on behalf of the Partnership.

We are committed to protecting privacy and confidentiality of any personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for our staff and student's personal information.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

Except as set out below, we do not share, or sell, or disclose to a third party, any information held about staff or students and related parties (parents/guardians).

Data We Process

We may collect, use, store and transfer different kinds of personal data . We have collated these into groups as follows:

- Identity includes information such as first name, last name, title, date of birth, and other identifiers that have been provided at some time.
- Contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information given to us for the purpose of communication or meeting.
- Transaction data includes details about payments or communications to and from students and information about products and services they have purchased from us.

- Technical data includes internet protocol (IP) address, 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 used to access our website.
- Profile includes information such as your username and password, purchases or orders made by you, preferences, feedback, survey responses.
- Marketing data includes preferences in receiving marketing from us; communication preferences; responses and actions in relation to use of our services.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify someone as an individual. Aggregated data may be derived from personal data but is not considered personal information in law because it does not reveal an identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with personal information so that it can identify someone in any way, we treat the combined data as personal information and it will be used in accordance with this policy.

Special personal information

Special personal information is data about 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.

We do collect special personal information about students. To use some of our services they are required to complete a medical health and consent questionnaire for us to determine whether the service is appropriate for them. This is primarily to ascertain that there are no medical contraindications that would preclude them from partaking in the activities involved with the service we provide. We do not collect any other special information about anyone.

The bases on which we process information

The law requires us to determine under which of six defined bases we process different categories of personal information.

If a basis on which we process personal information is no longer relevant, then we shall immediately stop processing that data.

If the basis changes, then if required by law we shall notify affected parties of the change and of any new basis under which we have determined that we can continue to process their information.

Information we process because we have a contractual obligation

When someone creates an account on our website, buys a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between them and us.

In order to carry out our obligations under that contract we must process the information they give us. Some of this information may be personal information.

We may use it in order to:

- verify identity for security purposes
- sell products
- provide our services
- provide suggestions and advice on products, services and how to obtain the most from using our services

We process this information on the basis there is a contract between both parties, or that they have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between both parties ends or is terminated by either party under the terms of the contract.

Information we process with consent

Through certain actions when otherwise there is no contractual relationship exists, such as when browsing our website or asking us to provide more information about our business, including our products and services, implied consent is provided to us to process information that may be personal information.

Wherever possible, we aim to obtain explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If explicit permission has been given, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products they would find useful.

We continue to process information on this basis until consent is withdrawn, or it can be reasonably assumed that consent no longer exists.

Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, to either party, of doing so.

Where we process information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause harm
- whether there is an expectation for us to process data, and whether it would be considered reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from parties to which we believe they would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting their interests where we believe we have a duty to do so

Information we process because we have a legal obligation

Sometimes, we must process information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include personal information

Information relating to payments

We do not hold payment information and it is never taken by us or transferred to us either through our website or otherwise. All payments are processed by a secure page provided by a third payment service provider completely independent of our website.

Cookies

Our website uses cookies, they are placed by software platform that operates on our website, and by software operated by third parties whose services we use. We only use essential cookies for the technical operation of the site in the following ways:

- to track website page navigation, especially in relation to using a third payment service provider
- to record whether someone has seen specific messages we display on our website
- to keep a person signed into our website
- to record answers to surveys and questionnaires on our site while they are being completed

We do not use cookies for marketing, advertising or individual behavioural analysis.

Subject Access Requests

Where we received a subject access request from someone, we will endeavour to respond in 10 working days. There is no fee for such requests. However, if we believe the request is 'manifestly unfounded or excessive', we may ask for a reasonable administration fee to cover our costs.

Amendment or Removal of Data

We will amend or remove data as requested, but only after we have taken reasonable step to verify the identity of the requester.

Retention of Data

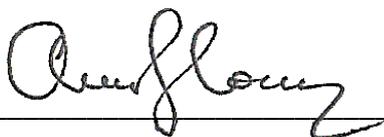
We keep personal information only for as long as required by us:

- to provide the services that have been requested;
- to comply with other laws, including for the period demanded by our tax authorities;
- to support a claim or defence in court
- to maintain a record of complaints

Where someone stops using our services and does not explicitly ask to remove their data, after a period of inactivity on the account of more than 9 months, we will attempt to contact the person and establish their intentions. If we are unable to contact the person, the account will generally be deleted after a further 3 months.

This Policy is approved and robustly endorsed by Afreaka Aerials LLP and will be reviewed annually or when there is a change in circumstances, in work practices or the introduction of new legislation.

Signed:



Name:

____GANNA SLOAN____

Date:

____14/02/2023____