

PRIVACY POLICY

Introduction

Welcome to Bea's Cheerleading privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data when using our services, including any data you may provide through this website (www.beascheer.co.uk) when you purchase a product or service, i.e. to become and/or for your child to become a member of Bea's Cheerleading Programme, to sign up and/or to sign your child up to one of our summer camps or school clubs or to buy Bea's Cheerleading merchandise.

This website is not intended for use by children below the age of 16.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below:

Full name: Bea's Cheerleading

Email address: info@beascheerleading.com

Postal address: 29 Hadfield Road, Stanwell, TW19 7JQ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in May 2018.

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.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified.

We collect the following personal information about you:

- Name
- Age/Date of Birth
- Address
- Telephone number
- Email address
- Title
- Gender
- Emergency contact
- Doctor's details
- Details of any health conditions, learning difficulties or disabilities
- Username/Password
- Computer IP addresses and other technology on the devices you use to access this website
- Child's details (name, age, data of birth, emergency contact, doctors details and any health conditions, learning difficulties or disabilities)

Some information is 'special' and needs more protection due to its sensitivity. This is likely to include anything that can reveal information relating to your or your child's physical or mental health. We will only collect this type of information for the purposes of your or your child's health, wellbeing, welfare and safeguarding. Where we hold this data it will be with your explicit consent or, if applicable, the explicit consent of the child's parent or guardian. If you give us this information about yourself or your child when communicating with us, you do so because you agree to us holding this information on our records and you consent to us doing so.

If you provide us with information about other individuals (e.g. an emergency contact), you confirm that you have informed the relevant individuals accordingly.

If you fail to provide personal data

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.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - give us feedback or contact us.
- **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 and other similar technologies. Please see our [cookie policy](#) for further details.
-

4. How we use your personal data

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we need the information to protect your vital interests or those of another person (i.e. to give medical assistance in an emergency).
- Where you have given your consent.

Purposes for which we will use your personal data

We will use your personal information for the following purposes:

- To register you as a new customer.
- To deliver goods, services and support to you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To manage your relationship with us in relation to the services we provide to you.
- To deliver relevant website content and to administer and protect our business and the website.
- To improve our services.
- To contact you in an emergency.
- To help investigate any complaints you have about our services.
- To monitor the quality of our services.

Marketing

We may contact you or send communications to keep you informed of your current membership status, tell you about future summer camps or school clubs or, for Bea's Cheerleading Programme athletes, to tell you about upcoming competitions. We won't need your consent to communicate with you in this way because we have assessed that it forms part of our agreement with you and it is of mutual interest for us to keep you informed and is relevant to your contract with us.

We may also want to occasionally send you information on other products and services we offer, and which we think will be of interest to you. We will ask for your consent to communicate this type of information to you, you can remove your consent and ask us to stop at any time.

5. Disclosures of your personal data

Like any business, we use services providers to operate our website, such as website hosting, and to help deliver our services to you, such as collecting subscription payments. Some of these service providers will process your personal data as part of the services they offer to us. 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.

We may share your personal data with the parties set out below for the reason(s) listed:

- **Competition Organisers:** For Bea's Cheerleading Programme, we may share your and/or your child's personal information with competition and event organisers for the purposes of entering a team into a competition or event.
- **Police:** We may share your personal information with the police for the purposes of preventing or detecting a crime or fraud.
- **Safeguarding and Support Agencies:** We may need to share your personal information with support agencies if we suspect that there may be safeguarding concerns about yourself or those who are your dependent(s). We will not tell you about this beforehand, we will take steps to only share that personal information which is necessary for the safeguarding purposes.
- **Professional Advisers:** We may need to share your information with lawyers, insurers and accountants who provide legal, insurance and accounting services.

6. International transfers

The majority of personal information is stored on systems in the EU. But there may be some occasions as our technology services progress, where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU. We will always have additional protections on your information if it leaves the EU ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

7. Data security

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 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.

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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below:

- **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.
- **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.
- **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.

- **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.
- **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:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - 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.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **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.
- **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.

If you wish to exercise any of the rights set out above, please contact us.

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.

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.

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.