

## Privacy Policy

### Purpose of policy

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to develop an understanding of our customer's needs and provide information about the work that we do.

The purpose of this policy is to give you a clear explanation about how we gather and use the information we collect from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information.

This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Our use of internet cookies
- Information about how we keep your personal information secure, how long we maintain it and your rights to be able to access it.

If you have any queries about this policy, please contact email:

[info@generationcircus.co.uk](mailto:info@generationcircus.co.uk)

### Information collection

We collect various types of information and in a number of different ways:

#### **Information you give us.**

For example, when you register on our website, buy tickets or make a donation, we'll

store personal information you give us such as your name, email address, postal address, telephone number. We will also store a record of your purchases and donations.

### **Information about your interactions with us.**

For example, when you visit our website, we collect information about how you interact with our content. When we send you a mailing we store a record of this, and in the case of emails we keep a record of which ones you have opened and which links you have clicked on.

### **Sensitive personal data**

Data Protection law recognises that certain categories of personal information are more sensitive than others, such as health information, race, religious beliefs etc. We do not usually collect this type of information unless there is a clear reason for doing so. As an example, we do collect medical information about course participants so that our teachers are aware of any issues, and can adapt the session to accommodate these needs and ensure overall safety and wellbeing.

### **Legal basis**

There are three main bases under which we may process your data:

- **Contract purposes**

When you make a purchase from us or make a donation to us, you are entering into a contract with us. In order to perform this contract, we need to process and store your data. For example, we may need to contact you by email or telephone in the case of cancellation of a class, or in the case of problems with your payment.

- **Legitimate interests**

In certain situations, we collect and process your personal info for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing.

- **With your explicit consent**

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation.

### **Marketing communications**

We aim to communicate with you about the work that we do.

To do this we use data that we have stored about you, such as which classes you have booked for in the past, as well as any preferences you may have told us about.

We will give you an opportunity to opt out of receiving marketing information from us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we send you, or you can alternatively use the contact details at the end of this policy.

## **Cookies**

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well to provide website operators with information on how the site is being used.

We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make.

## **Third parties**

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider). In these cases, we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

## **Your debit and credit card information**

If you use your credit or debit card to purchase from us or to make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

## **Maintaining your personal information**

We store your personal data for as long as required to operate the service we are providing to you or for archival purposes and in accordance with legal requirements and accounting rules.

If you have not engaged with us for a period of two years and we do not need to keep your personal data for archival, legal or business reasons, we will delete or suppress your personal information.

Where your information is no longer required, we will ensure it is disposed of in a secure manner.

If there are aspects of your record that are inaccurate or that you would like to change, you can usually do this by logging in to your account through our website. If you don't have an account, and wish to change or delete your record, please use the contact details below.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

## **Security of your personal information**

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless that country has been approved by the European Commission or has signed up to the EU-US Privacy Shield framework.

Your rights to your personal information

1. The Right to be informed
2. The Right to Access
3. The Right to Rectification
4. The right to be forgotten
5. The right to restrict processing
6. The right to data portability
7. The right to Object
8. The Right not to be subject to automated decision-making including profiling

### **Contact details and further information**

If you have any queries about this policy, or wish to object to any processing of your personal information please contact Generation Circus email:

[info@generationcircus.co.uk](mailto:info@generationcircus.co.uk)

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