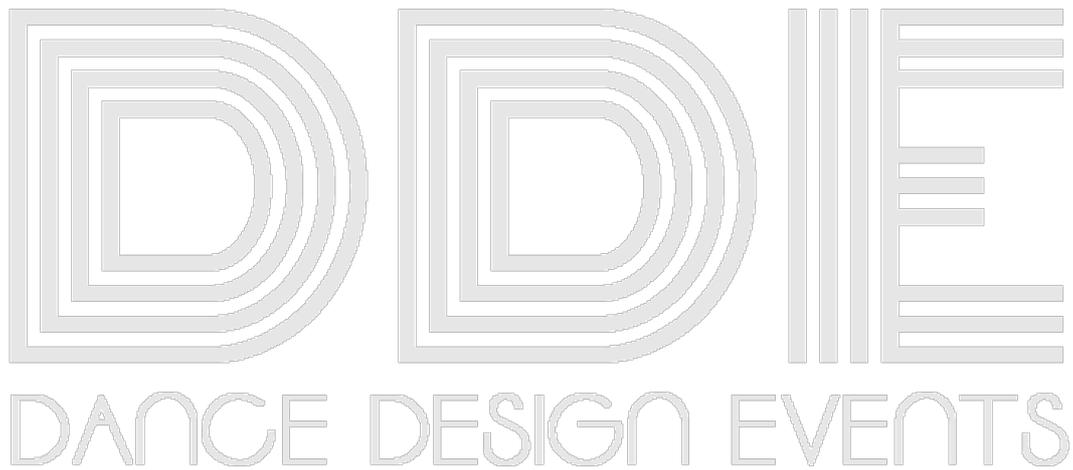


# DANCE DESIGN EVENTS

DATA PROTECTION POLICY 2018/2019



## About this Privacy Policy

1. Dance Design Events and iDDEntity are committed to protecting our customer's privacy. Please take the time to review this notice which explains what information we collect about our customers, participants and suppliers, how we use it, and your rights as a data subject. Dance Design Events (“iDDEntity”, “we” or “us”) is the data controller of the personal data collected through the Dance Design Events website (the “Site”) or other means in connection with events produced by Dance Design Events.
2. The types of personal data that Dance Design Events may be required to handle include information about current, past and prospective suppliers, customers, participants and others that we communicate with. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act 1998 (the “Act”) and as of 25 April, the General Data Protection Regulation (“the Regulation”).
3. This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from your, or that is provided to us by your or other sources.
4. This policy does not form part of any employee's contract of employment and may be amended at any time.
5. This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.
6. The **Data Protection Compliance Manager** is responsible for ensuring compliance with the Act and with this policy. That post is held by Jennifer Owens ([iDDEntity@dancedesign-events.co.uk](mailto:iDDEntity@dancedesign-events.co.uk)). Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Compliance Manager.

## What personal data do we collect about you?

7. We collect personal data from you when you provide it to us directly and through the use of the Site. This information may include:
  - 7.1 Information you provide to us when you use our Site (e.g. your name, contact details, product reviews, and any information which you add to your account profile);
  - 7.2 Transaction and billing information, if you make any purchases from us or using a credit or debit card (e.g. credit/debit card details and delivery information);
  - 7.3 Records of your interactions with us (e.g. if you ask us a question, contact our customer service team or interact with us on social media);

- 7.4 Information you provide us when you enter a competition or participate in a survey;
- 7.5 Information you provide for compliance with regulatory requirements for performance involving children.
- 7.6 Information collected automatically, using cookies and other tracking technologies (e.g. which pages you viewed and whether you clicked on a link in one of our email updates). We may also collect information about the device you use to access our Site; and
- 7.7 Other information necessary to provide the Site, for example we may access your location if you give us your consent.

### **How do we collect personal data?**

8. We collect personal data in the following ways:

- 8.1 via the online entry forms for our events and competitions;
- 8.2 via hard copy entry forms for our events and competitions;
- 8.3 via licensing contact information forms submitted for and on behalf of performers at our events and competitions
- 8.4 via cookies on our Site
- 8.5 via communications between us and you, e.g. via email, social media or instant messaging platforms.

### **What do we use this personal data for?**

9. Depending on the permissions you give us, the purposes for which we use your personal data include:
- 9.1 To fulfil your process your entry submissions
  - 9.2 To comply with our obligations as an organiser events subject to The Children (Performances and Activities) (England) Regulations 2014
  - 9.3 To ensure that our events and competitions are organised in a fair and proper manner
  - 9.4 To create identity cards for each participant performing at a Dance Design Events' production
  - 9.5 To ensure the health and safety of all performers participating in our events and competitions.

- 9.6 To manage and respond to any queries or complaints to our customer service team.
  - 9.7 To improve and maintain the Site, and monitor its usage.
  - 9.8 For market research, e.g. we may contact you for feedback about our products and services
  - 9.9 To send you marketing messages and show you targeted advertising, where we have your consent or are otherwise permitted to do so.
  - 9.10 For security purposes, to investigate fraud and where necessary to protect ourselves and third parties.
  - 9.11 To comply with our legal and regulatory obligations.
10. We rely on the following legal basis, under data protection law, to process your personal data:
- 10.1 Because the processing is necessary to perform a contract with you, or take steps prior to entering into a contract with you (e.g. where you have made a purchase with us, we use your personal data to process the payment and fulfil your order).
  - 10.2 Because we have obtained your consent (e.g. where you contact us with a query, where you add optional information to your account profile, or if you consent to receive marketing from us).
  - 10.3 Because it is in our legitimate interests as an e-commerce provider to maintain and promote our services. We are always seeking to understand more about our customers in order to offer the best products and customer experience. We use information about you to tailor your view of the Site, to make it more interesting and relevant in respect of the products and offers on view.

**Who do we share this personal data with?**

11. We share customers' personal data with third parties in the following circumstances:
- 11.1 With our professional and legal advisors.
  - 11.2 With law enforcement or other governmental authorities, e.g. to comply with child performance licensing regulations and health and safety regulations including our obligations under the Children's Act 1993 and the Child (Performance and Activities Regulations 2014)
  - 11.3 With third parties whom we have a contractual relationship and are required by virtue of said contractual relationship i.e. third party service providers and suppliers.

11.4 In the event that we sell any business assets, the personal data of our customers may be disclosed to a potential buyer. In this event, we will make reasonable attempts to ensure the buyer will be bound by the terms of this Privacy Policy.

11.5 Otherwise where we have your consent or are otherwise legally permitted to do so.

## **Storage and Retention**

12. We use service providers based around in the United Kingdom. We also work with third party suppliers for our software, processes and systems that may involve the storage data outside of Europe. Consequently, personal data may be processed in countries outside of Europe, including in countries with fewer legal protections for personal data than under local law. If we transfer personal data outside the European Economic Area we will, as required by applicable law, ensure that any privacy rights are adequately protected by appropriate safeguards, in particular the EU's standard contractual clauses. Please contact us if you would like more information about these safeguards.

13. We will keep personal data only for as long as we need it for the purposes set out above, and so this period will vary depending on your interactions with us. For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim. Where we no longer have a need to keep your information, we will delete it. Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

## **Data Security**

14. We will process all personal data we hold in accordance with our Data Security Policy. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

15. We will put in place processes and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

16. Security processes include:

16.1 Password protected equipment personalised to a unique user

16.2 Encrypted email and digital transfer of personal data.

- 16.3 Secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- 16.4 Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required.
- 16.5 Equipment. Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

## **Transfer**

- 17. Any personal data we collect is stored in the UK. We may transfer any personal data we hold to a country outside the European Economic Area ("EEA"), provided that one of the following conditions applies:
  - 17.1 The country to which the personal data are transferred ensures an adequate level of protection for the data subjects' rights and freedoms.
  - 17.2 The data subject has given his consent.
  - 17.3 The transfer is necessary for one of the reasons set out in the Act, including the performance of a contract between us and the data subject, or to protect the vital interests of the data subject.
  - 17.4 The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
  - 17.5 The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of the data subjects' privacy, their fundamental rights and freedoms, and the exercise of their rights.
- 18. Subject to the requirements in clause 12.1 above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff may be engaged in, among other things, the fulfilment of contracts with the data subject, the processing of payment details and the provision of support services.

## **Children**

- 19. Our Site and data collection form is not intended for, and should not be used by, children under the age of 16. Personal data for children under the age of 16 should only be submitted through our website with the consent of the child's parent or guardian.

## **Cookies**

20. Our Sites uses cookies and similar technologies to provide certain functionality to the Site, to understand and measure its performance, and to deliver targeted advertising.

## **Your rights**

21. You have certain rights in respect of your personal data, including the right to access, correct, and request the erasure of your personal data.
22. You also have the right to object to your personal data being used for certain purposes, including to send you marketing.
23. We will comply with any requests to exercise your rights in accordance with applicable law. Please be aware, however, that there are a number of limitations to these rights, and there may be circumstances where we are not able to comply with your request. To make any requests regarding your personal data, or if you have any questions or concerns regarding your personal data, you should contact us using the details below. You are also entitled to contact your local supervisory authority for data protection.
24. You are entitled to make a formal request for information we hold about you. Any request must be made in writing. On receipt of an access request the identity of the requestor will be verified and the data held for the requestor will be identified and handled accordingly. Please be aware, however, that there are a number of limitations to these rights, and there may be circumstances where we are not able to comply with your request.

## **Change to this policy**

25. We reserve the right to change this policy at any time. Where appropriate, we will notify data subjects of those changes by mail or e-mail.

## **Contact Us**

If you have any queries on any aspect of our Privacy Policy, please contact us by email at [iDDEntity@dancedesign-events.co.uk](mailto:iDDEntity@dancedesign-events.co.uk) or by post at the address below.

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