

The Cecchetti Society Trust (**we**) are committed to protecting and respecting your privacy.

This policy (together with our Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

When we collect and use personal data about you, we are subject to the UK General Data Protection Regulation. We are also subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (**EEA**).

#### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following personal data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site [www.cecchettisocietytrust.org](http://www.cecchettisocietytrust.org) (**our site**) or by responding to surveys, competitions and promotions, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, register to participate in any events we are involved with, search for a product or service, and when you report a problem with our site.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
  - information from accounts you link to us, eg Facebook.

- **Information we receive from other sources.** We may receive information about you from your dance school or organisation, or if you use any of other websites we may operate or the other services we may provide. We are also working closely with third parties (including, for example, other Cecchetti organisations, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

## **COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

## **USES MADE OF THE INFORMATION**

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the

subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the registration form). You can also opt out of receiving marketing communications at any time by using the 'unsubscribe' link in emails or 'STOP' number in texts;

- to notify you about changes to our service;
  - to detect and prevent fraud;
  - to do an identity check where this becomes relevant (see "Identity checking" section below);
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
    - to allow you to participate in interactive features of our service, when you choose to do so;
    - as part of our efforts to keep our site safe and secure;
    - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
    - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
  - **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **DISCLOSURE OF YOUR INFORMATION**

We may share your information with selected third parties including:

- third parties we use to help deliver our products and services to you, eg payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our organisation, eg marketing agencies or website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We may also need to:

- share personal data with external auditors, eg in relation to the audit of our accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

#### **KEEPING YOUR DATA SECURE**

We will use technical and organisational measures to safeguard your personal data, for example if we need to store your personal data, it will be stored on secure servers.

We will keep your personal data while you have an account with us or we are providing products or services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

#### **TRANSFERS OF YOUR DATA OUT OF THE UK AND EEA**

The data that we collect from you may be transferred to, and stored at, a destination outside the UK or the EEA. It may also be processed by staff operating outside the UK or EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting personal data, you agree to this transfer, storing or processing. Under data protection law, we can only transfer

your personal data to a country or international organisation outside the UK/EEA where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an ‘adequacy decision’);
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law.

## **YOUR RIGHTS**

You have certain rights in certain circumstances to require us to treat your personal data in a particular way or to access your personal data or to have us transmit your personal data to a third party.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘How to contact us’; and
- provide enough information to identify yourself and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

## **CONTACT**

Questions, comments and requests regarding this Privacy Policy should be addressed to [chair@cecchettisocietytrust.org](mailto:chair@cecchettisocietytrust.org).