**Privacy Notice**

# General

Just Dance are committed to ensuring that your privacy is protected. This privacy notice explains how we collect information about you and how we process this information. It applies to information we collect through several club interactions, such as:

* visitors to our websites;
* individuals requesting information or making enquiries, reports or complaints;
* people who join the club and fill in: membership forms, medical form, next of kin forms.

Your personal data will be collected by Just Dance who will act as the Data Controller.

Just Dance are the Data Controller and are committed to protecting the rights of the individual in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR).

Just Dance Data Protection advisory can be contacted through lisajustdance@aol.co.uk

# The Purpose and Legal Basis of Processing Personal Data

Just Dance collects several categories of data:

### A sub-set of your personal data: names, emails and telephone number will be shared with other members of the club for the purposes providing members with information (e.g. rehearsals, show dates, show requirements)

* If you would like to opt-out of this club-wide list please inform the secretary.
* Just Dance will because of the nature of the organisation, may possible collect special categories of data including: medical information and next of kin data, under the terms of “vital interest” for your and others safety.
* All of your personal data, including special categories of data, may be access by authorised members of the committee to ensure a safe environment for you or other members of the club.
* Just Dance will utilise a soft-opt-in method for direct marketing or relevant related products or services. You are able to opt-out at any time.
* Just Dance with your consent use your images for publicity purposes especially where images are taken in places where you may have an expectation of privacy.
* Just Dance may issue surveys or ask for other personal data where it will be optional to respond, therefore there may be an applied consent.
* Just Dance Website does not use Cookies.

# The Information Just Dance collects

The types of personal data collected includes:

* Name
* Address
* Possibly Next of Kin data (Name, Telephone, Address)
* Telephone Numbers
* Email
* Online Identifiers (e.g. Whats App IDs.)
* Possibly Bank or Card Details (but not CVC/CVV/AVS/AAV Numbers).

The types of special categories of data collected includes:

* Biometrics for identification (e.g. photographs, passport images)
* Gender
* Medical Data
* Criminal Data (e.g. DBA checks for the purpose of chaperoning minors)
* Personal Dietary Requirements

# Your Personal Data Rights

Just Dance will respect all of your Data Subject Rights. Before communicating your personal data you will be authenticated, and all responses will be within 30 days. These Rights include, but not limited to:

**The Right of Access:** At any time, you can ask for a copy of your personal information. Just Dance will respond with whether data is held or not, if data is held then a copy of the information and the required supplement notice will be offered to you.

**Right of Rectification:** allows you can submit changes to your records, and once changes are verified they will be amended to Just Dance records. Similarly, Just Dance will periodically request you to check your data is held accurately.

**Right of Erasure:** If you request your data to be erased, and there is no other lawful basis to keep your data, then it will be removed.

# Retention Periods

All personal data collected will be held for a period of 1 year from the end of your membership. This includes: personal data, and medical data.

Data collected under consent will be used until consent is withdrawn or if it is no longer useful for the purpose with which it was collected. Some data may not be removed if it involves a disproportionate effort, e.g. a website image of you is held by the Google search engine.

This does not affect your Rights as a data subject.

# Failing to Provide Necessary Personal Data

Failing to provide some or all the necessary personal data may result in:

* Not receiving Just Dance related news, updates, additional sessions or social events
* Being a chaperone for a minor at any events

# Sharing Personal Data

Just Dance may share your personal data with other organisations in order to carry out social related activities. This could include show and social venues, exams and licences.

If Just Dance shares your data on a regular basis it will performed due-diligence and hold written contracts and agreement with these organisations to legally safeguard your data.

If you have consented for us to share your data with other organisation for the purposes of marketing, we will keep your consent on record until it is withdrawn, or the purpose is no longer valid. On withdrawal of consent Just Dance will endeavour to contact these organisation on your behalf to remove your consent.

# Transfer to International Countries

Your data will not be transferred internationally. If your data is transferred, Just Dance will legally safeguard your personal data by:

* Transferring to the EEA countries
* Transferring to an EU Adequate country, or a US Privacy Shield company.
* Transferring under “EU Model Clauses” agreement with the importing party.

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area that do not have similar protections in place regarding the protection of your personal data. Where this is the case end-to-end encryption will be employed to transmit the data securely. For example, using SSL or TLS to connect to websites or using email encryption technologies.

Where Just Dance are unable to utilise legal safeguards when transferring data to a third-country, then Just Dance will seek consent from the data subject to facilitate the data transfer.

# Information Security

* **Transmission:** Only members authorised by the committee is able to view members full records, this included special categories of data. All member will have access to a small sub-set of your personal contact information. Where personal data is transmitted either encrypted paths are used e.g. SSL or in the case of paper-based record will be locked out-of-sight.
* **Storage:** Member’s electronic records are located securely on committee computers or electronic storage devices. In all cases, member electronic data will be stored in a password protected encrypted format. Members paper-based records will be stored in a locked filing cabinet to prevent inadvertent access by unauthorised 3rd parties
* **Security:** We utilise strong encryption on or mobile devices and removable media to protect personal data in transit or at rest.
* **Disclosure of member personal data:** We do not disclose personal data unless we’re required to do so to comply with the law or a valid and binding order from a governmental or regulatory body.
Just Dance would disclose your data if we deem it to be within your “Vital Interest”.

# Automated Decision Making and Profiling

The information you provided to Just Dance will be provisioned on to the Just Dance database. Just Dance systems do not make automated decisions nor perform any online profiling. This does not affect your Rights as a Data Subject.

# Data Subject Rights

If you would like to exercise your Data Subject Rights including your right access; rectification; erasure; restriction; or objection to processing, please contact the Club Secretary who is the acting Data Protection Representative.

# Escalate a Data Protection Concern

While you should contact Just Dance in the first instant of a compliant or dispute. You have the right of redress and you are welcome to contact the Information Commissioners Office, please see: <https://ico.org.uk/concerns> or call the ICO on: 0303 123 1113.