



TFX Performing Arts Community
Inverness Ice Centre,
Bught Park
Inverness, IV3 5SR
01463 417337
info@tfxperform.com
www.TFXperform.com

Privacy Notice for TFX Performing Arts Community

As someone who interacts with TFX Performing Arts Academy, you have the right to be informed of what we do with your data. At TFX, we're committed to protecting and respecting your privacy. This privacy notice tells you what to expect when TFX collects personal information. It also explains when and why we collect this information, how we use it, the conditions under which we may disclose it to others, how we keep it secure and what rights you have in relation to the data we hold about you.

Please read the following carefully to understand our practices regarding your personal data. By visiting <http://www.tfxperform.com> you are accepting the practices described in this policy.

How can you contact us?

If you have any questions or concerns regarding our Privacy Notice or our processing of your personal information, please contact:

TFX Data Protection Officer
Inverness Ice Centre
Bought Park
Inverness
IV3 5SR

Email: info@tfxperform.com or by telephone at 01463 417337.

Notification of Change of Privacy Notice

We may modify this privacy notice at any time, but if we do so, we will notify you by publishing the changes on the www.tfxperform.com website. If we determine the changes are material, we will provide you with additional, prominent notice as is appropriate under the circumstances, such as via email. If, after being informed of these changes, you do not end your association with TFX, you will be considered as having expressly consented to the changes in our privacy notice. If you disagree with the terms of this notice, or any updated version of this notice, you may exercise your rights to end your association with TFX at any time. This notice was last updated on 7th May 2018.

Use of cookies

A cookie is a very small text file that is placed on your hard drive by the server of a web page you visit. It is an individual label, which identifies you as a visitor. TFX does not use cookies to collect personally identifiable information. TFX does, however, use session cookies to:

- Collect statistical data on visitor movement and use of our websites in order to help us optimise them
- Remember things like information you've entered on forms when you navigate away to other pages in a single web browser session
- Recognise that you are visiting areas of our website
- Improve the user experience by integrating third-party social media tools and services

When someone visits www.tfxperform.com we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

How to control or delete cookies

You can delete cookies already on your computer or device at any time. If you choose not to accept cookies at all, you can still visit our website, however, when cookies are disabled, we cannot guarantee an optimum experience and there will possibly be content or functionality that is no longer available. Visiting the Help section within your browser should provide information on how to do this. For mobile devices you may need to refer to the product manual.

For more information about controlling and deleting cookies please visit <http://www.aboutcookies.org.uk/>

How do we collect your information?

We obtain information about you when you use our website, for example, when you contact us about TFX services and classes, take out a membership, or if you register on the website to access free resources and/or receive one of our newsletters.

What information do we collect?

When we do collect information from you, either directly or from third parties we work with, this information may include:

- name
- address
- email address
- telephone number
- contact preferences
- childrens' dates of birth
- medical conditions we need to be aware of

We may also collect and process information about your interactions with us, including details about our contact with you through email, post and telephone. In addition we may collect and record any other relevant information you share with us about yourself, including your interests or your affiliations with other community groups and pages that you have visited on our website.

What is the purpose of the processing that TFX does of the data it collects?

We may contact you for marketing purposes by email if you have agreed to be contacted in this manner. We will also send you service communications via email when you book a place on a class on our website, or taken out a membership. We may also use your information to analyse and improve the content and operation of our website, and where we are required by law to disclose or otherwise use your information.

If you have provided us with your postal address or telephone number, we may send you information about our work or other communications of the kinds described above by direct mail or contact you by telephone unless you have told us that you would prefer not to hear from us in this way. We provide information about how you can change your marketing preferences below.

When we process your personal data, it will only be used for the purpose for which it was collected.

Your choices

You have a choice about whether you wish to receive information from us. If you do not want to receive direct marketing communications from us about the classes, workshops and opportunities we offer families then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email or phone unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted in that way.

You can change your contact preferences at any time by:

- emailing the Enquiries team at info@tfxperform.com
- calling the TFX Head Office on 01463 417 337.

On the occasions that you have paid for a class or a membership, we will contact you by email, phone or post with information that is relevant to that service. Examples of this may include a phone call with late changes to a course, or renewal information for your membership if required. One of the membership benefits is to receive occasional emails about the term specific discounts and special offers. Whilst you have the option to choose not to receive these emails, you will still receive information about your TFX auto re-enrol because this is necessary as part of the contractual agreement you have with TFX.

To ensure that our communication with you is relevant and tailored to your interests, we may supplement what we know about you with information that is available to the public. This allows us to better understand your interests, preferences, and level of potential engagement, so that we can contact you in the most appropriate way. The information we collect and process about you from publicly-available sources may include demographic information associated with your postcode or your address and an estimate of your age. We collect this information ourselves and may use third-party service providers from time to time.

We process personal information for certain legitimate business purposes where the processing enables us to enhance, modify, personalise or otherwise improve our services / communications for the benefit of our customers.

You are not required to provide personal data to us. Please note, however, that if you choose not to share your personal information with us, this will affect our ability to provide a service you may request. For example, we are unable to process any refund you may be due if you do not provide your banking information.

Do we process sensitive personal information (special category data)?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs, and political opinions ('special category data'). In limited cases, we may collect special category data about you. We would only collect special category data if there were a clear reason for doing so, such as where we need this information to ensure that we provide appropriate support when you participate in TFX classes, or information needed to support and give understanding to the TFX teaching staff.

When special category data is collected, it is held securely and is only available to the specific people that need to access that information. Those specific people may be TFX employees.

How do we protect your personal information?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it if it is reasonable and necessary to fulfil the need for which it was collected. As noted above, due to the nature of the TFX classes, it is often necessary to keep information for an indeterminate period. This is because the circumstances under which you join and participate in a TFX class or workshop may recur later, and historical information is always beneficial.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk. However, any payment card details (such as credit or debit cards) we receive are passed securely to our payment processing provider according to the Payment Card Industry Security Standards.

How can you update your Contact Preferences or Update the Information we hold about you?

If you do not wish us to use your personal data for marketing purposes as outlined above, you can change any of your contact preferences at any time by:

- Indicating that you do not wish to receive our marketing emails by clicking the 'unsubscribe' link in at the end of our marketing emails;
- Contacting us through our Enquiries team by email at info@tfxperform.com or by telephone at 01463 417337, or by writing to us at:

TFX Data Protection Officer
Inverness Ice Centre
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If your contact details have changed or you think any information we have about you is incorrect or incomplete, you can always update or correct the information we hold about you by contacting us through our Data Protection Officer at info@tfxperform.com, or by updating your details on our website after logging in, by visiting our application form page and updating through an application form. <http://www.tfxperform.com/how-to-apply/timetable>

What other Data Protection rights do you have?

The following outlines the rights that you have, and how they can be exercised.

Making a Complaint

You can make a complaint or raise a concern about how we process your personal data by contacting our Data Protection Officer at info@tfxperform.com If you are not happy with how we have handled your complaint, you can contact the Office of the Information Commissioner, which oversees the protection of personal data in the UK.

Right of Access / 'Subject Access Request'

You have a legal right to have confirmation that your data is being processed, and to have a copy of the personal and supplementary information we hold about you. This is known as a 'Subject Access Request'. We will provide a copy of this information free of charge, in a commonly used electronic format such as a PDF file.

Please note that if a request comes in that is manifestly unfounded or excessive or repetitive, we will charge a fee based on the administrative cost for providing this information. We will also charge a fee to comply with requests for further copies of the same information. All information will be provided within one month of being requested, unless the request(s) are complex and/or numerous. In this case, the period of compliance will be extended by a further two months, but you will be informed within one month of making the request that this extension has been applied, including explanation as to why.

Right of Rectification

You have a right to correct any errors in the information that we hold about you if it is incomplete or inaccurate.

Any request for rectification will be responded to within one month, and will be free of charge. To contact us to exercise your Right of Rectification, please email the Data Protection Officer info@tfxperform.com with the details that you require to be updated. No changes will be made until reasonable steps are taken to verify the identity of the person making the request.

Alternatively, as outlined above, you can update your information yourself by logging in to the website and visiting <http://www.tfxperform.com/how-to-apply/timetable>

Right of Erasure / Right to be forgotten

You have a right to request that TFX delete or remove the personal data we hold about you when there is no compelling reason for its continued processing. Please note that the right to erasure does not provide an absolute 'right to be forgotten'. You have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data has to be erased in order to comply with a legal obligation

In regards to exercising a right to be forgotten with regard to photographs, individuals have the right to request photos be removed from websites and future versions of printed materials, but we cannot guarantee that we can remove from social media.

Any request for erasure will be responded to within one month, and will be free of charge. To contact us to exercise your Right of Erasure please email the Data Protection Officer info@tfxperform.com with the details that you require to be erased. No changes will be made until reasonable steps are taken to verify the identity of the person making the request.

Right to Restrict Processing

You have the right to 'block' or suppress the processing of your personal data. This means that TFX will continue to store the personal data, but not process it any further. We will retain just enough information about you to ensure that the restriction is respected in future.

Any request for restriction of processing will be responded to within one month, and will be free of charge. To contact us to exercise your Right of Restricted Processing, please email the Data Protection Officer info@tfxperform.com with the details that you require to be restricted. No changes will be made until reasonable steps are taken to verify the identity of the person making the request.

Right to Object

You have the right to object to:

- direct marketing (including profiling)

We will stop processing your personal data for direct marketing purposes as soon as we receive an objection, and this is free of charge. To update your preferences for Direct Marketing, please see the section on 'How can you update your Contact Preferences or Update the Information we hold about you?'

Why are we allowed to process your personal information?

Our Privacy Notice considers several laws, including:

- the Data Protection Act 1998 (also known as DPA98)
- the Data Protection Act 2018 (also known as DPA18) which brings into force in the UK. This will come into force in the UK on 25th May 2018 and will replace DPA98

- the Privacy and Electronic Communications (EC Directive) Regulations 2003 (also known as PECR)

Generally, our processing of your personal information as described in this notice is allowed by these laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can perform a contract with you or because it is required by law. We only use your information to send you marketing communications by email with your consent, and you can always opt out of receipt of marketing communications by email, post or telephone as explained in the section on 'How can you update your Contact Preferences or Update the Information we hold about you?'

How will we disclose the information we have collected to outside parties?

We will never sell, rent or trade your personal data. We may disclose your data to our service providers (such as outlined below) who render services to us or you on our behalf (all of which are contractually obligated to act only on our instructions and in accordance with applicable laws, including the GDPR).

For example,

- For families that agree to speak to the media to help publicise our work, we will ask for your consent. Once this has been granted, TFX will send out a media release to various different media outlets. No contact details will be on the press release. If a journalist wishes to interview you, again consent from you will be obtained. Once consent is granted TFX will send your name and your contact details to the journalist.

We may disclose your personal information if we are requested or required to do so by a regulator or law enforcement, or to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect TFX, for example, in cases of suspected fraud or defamation, or to comply with any other applicable legal obligation.

Children's Data

TFX does not offer an online service for children. We do, however, collect data about children when we collect information for classes, or for applications to our workshops. The basis for processing this information is consent, and if the child is under the age of 13, the consent will be sought from the parent. The child cannot give the consent themselves.

Other Websites

Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

Emails Terms of Use

Emails aren't always secure, and they may be intercepted or changed after they've been sent. TFX doesn't accept liability if this happens. The contents of emails reflect their author's views and not necessarily those of TFX.

The information in emails is confidential, so if you've received one by mistake, please delete it without copying, using, or telling anyone about its contents.

Your Credit or Debit Card Information

If you use your credit or debit card to join a workshop, take out a membership or make any other booking, we pass your card details securely to our payment processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard, and don't store the details on our website or databases.

If you call us and give us your details over the phone, we process your payment via a WorldPay secure connection that meets PCI DSS Standards. PCI DSS is the worldwide Payment Card Industry Data Security Standard that was set up to help businesses process card payments securely and reduce card fraud. This is achieved through enforcing tight controls surrounding the storage, transmission and processing of cardholder data that businesses handle. PCI DSS is intended to protect sensitive cardholder data. The card financial information is then destroyed, so that any paper copies of transactions that have taken place cannot be used by another person to process an inappropriate payment. For further information about PCI DSS standards, please contact info@tfxperform.com with your query.

End of TFX Privacy Policy