



Birmingham Dance Network CIC  
78 Ridgeway, Birmingham B17 8JG  
Company Registration: 10998553  
Artistic Director: Genevieve Say

## Privacy Policy

### 1. INTRODUCTION

This privacy policy provides you with details of how we collect and process your personal data.

By providing us with your data, you warrant to us that you are over 16 years of age.

**Birmingham Dance Network** is the data controller (referred to as “we”, “us” or “our” in this privacy policy) and we are responsible for your personal data.

#### Contact Details

Full name of legal entity: Birmingham Dance Network CIC

Email address: [info@birminghamdancenetwork.co.uk](mailto:info@birminghamdancenetwork.co.uk)

Postal address: 78 Ridgeway, Birmingham, West Midlands, B17 8JG

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [info@birminghamdancenetwork.co.uk](mailto:info@birminghamdancenetwork.co.uk) or by following this link to Mailchimp.

### 2. WHAT DATA DO WE COLLECT ABOUT YOU AND FOR WHAT PURPOSES, AND ON WHAT GROUNDS DO WE PROCESS IT?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

**Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, email (including an emailed application form), text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

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**Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

**User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and to ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and our business. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business.

**Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business, to grow our business and to decide our marketing strategy.

**Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and give-aways, to deliver relevant website content and advertisements to you and to measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is our legitimate interests, which in this case is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

## **Sensitive Data**

Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions or trade union membership, and information about your health and genetic and biometric data. If we collect any data such as this in order to monitor our audience for funding purposes, this form will be anonymous. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you do not provide us with the requested data, we may have to cancel a product or service you have ordered but, if we do, we will notify you at the time.

We will use your personal data only for a purpose for which it was collected or a reasonably compatible purpose if necessary. For more information on this please email us at [info@birminghamdancenetwork.co.uk](mailto:info@birminghamdancenetwork.co.uk). In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision-making or any type of automated profiling.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We may collect data about you by your providing the data directly to us (for example by filling in forms in person at an event or on our website, by sending us emails, or when you buy a product or service from us). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy below for more details about this.

We may receive data from third parties, including analytics providers such as Google based outside the EU and advertising networks such as Facebook based outside the EU.

We may also receive data from publicly available sources such as Companies House and the Electoral Register, based inside the EU.

### **4. MARKETING COMMUNICATIONS**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our

goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited

company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at [info@birminghamdancenetwork.co.uk](mailto:info@birminghamdancenetwork.co.uk).

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations, etc.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer or merge parts of our business or our assets.
- Third parties who fund or commission our activity, for the purposes of evaluation.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We allow such third parties to process your personal data only for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers (such as Dropbox, Google, etc) are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will transfer your personal data only to countries that the European Commission has approved as providing an adequate level of protection for personal data; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission, which give personal data the same protection it has in Europe; or

- If we use US-based providers that are part of EU-US Privacy Shield, such as Eventbrite for purchasing tickets, we may transfer data to them, as they have equivalent safeguards in place. You can read Eventbrite's privacy policy [here](#).

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## **7. DATA SECURITY**

We allow access to your personal data only to those BDN team members and partners who have a business need to know such data. They will process your personal data only on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## **8. DATA RETENTION**

We will retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, and the processing purposes, and whether these can be achieved by other means and legal requirements.

For tax purposes, the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction or transfer, to object to processing and to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [info@birminghamdancenetwork.co.uk](mailto:info@birminghamdancenetwork.co.uk).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request, to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **10. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **11. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **What is a cookie?**

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

## How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards to how you are using our website. This helps us to develop and improve our website as well as products and/or services in response to what you might need or want.

Cookies are either:

- Session cookies: these are stored on your computer only during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID, which allows you to browse a website without having to log in to each page, but they do not collect any personal data from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and/or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

We will regularly monitor and update this policy as necessary.