

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of your personal data.
- 1.2 This policy applies where we are acting as data controller and data processor with respect to your personal data; in other words, where we process and determine the purposes and means of the processing of that personal data.
- 1.3 We might use cookies on our website.
- 1.4 We operate privacy controls which affect how we will process your personal data. You can specify whether you would like to receive direct marketing communications and limit the publication of your information].
- 1.5 In this policy, "we", "us" and "our" refer to Franco Gareddu and Rebecca Olsen. For more information about us, see Section 13.

2. Credit

- 2.1 This document was created using a template from SEQ Legal, <https://seqlegal.com>.

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 3.3 We may process your information included in your personal profile on our database ("**profile data**"). The profile data may include your name, address, telephone number, email address, pictures, gender, date of birth, relationship status, interests, profession and hobbies, dietary requirements. The source of the account data is you or someone authorised by you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities.
- 3.4 We may process information that you post for publication on our website, post via traditional mail, email, sms or through any other services addressed from you to us ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- 3.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities.
- 3.6 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your contact details, and information contained in communications between us and you or someone authorised by you. The source of the customer relationship data is you or someone authorised by you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities.
- 3.7 We may process [information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis 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 and our legitimate interests, namely the proper administration of our website and business OR any legal basis such as keeping tax accounts.
- 3.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities.
- 3.9 We may process information contained in or relating to any communication that you send to us via our website ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities.
- 3.10 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 3.11 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.12 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.13 Unless we prompt you to do so, please do not supply any other person's personal data to us, unless formally authorised (in writing by the other person and able to copy such authorisation to us).

Notwithstanding the other provisions of this Section 3, consent from individuals will only be sought for new data entering our system from the 25th of May 2018. No consent will be sought in respect of existing data where we have a legitimate interest to process such data.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to any member of our group of companies this means our subsidiaries, our ultimate holding company and all its subsidiaries insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 We will disclose in writing or viva voce your name, gender, place and date of birth to any Airline, Ferry, Coach Company and any other service provider we use to transport you to/from any destinations. We will make a similar disclosure to any Hotel, Holiday Centre or other venue where our events are, will or have taken place. Such disclosure will be made insofar as reasonably necessary, for example to allocate room/s specifically to you or people nominated by you, to speed check-in process and avoid releasing your travel documents at hotel/airport check-in, to provide the necessary information to register your gender, name, surname and middle name/s with any service provider such as transportation and accommodation Companies, Businesses and/or Establishments. When you subscribe to one of our events, your name and surname may at times be included on lists prepared by us and publicly available for all to see on our web site, other service provider web site or printed. This will occur only when necessary, for example when detailing a list with participants names, tables allocated in restaurants and seats on coaches to be used by individuals, such list would be posted on our website for the participants to download and therefore will be publicly visible. Likewise, lists of names and surnames might be publicly visible on airlines/ferry/trains/other transports web sites in respect of groups/individuals being carried by service providers to various airports/ports/stations/coach&bus stops or any destinations from where you will reach the hotel selected for our dance events. Service providers will handle and process the information that we provide about you in order to deliver their service/s to you and to us.
- 4.4 Financial transactions relating to our website and services may be handled by our payment services providers, for example PayPal and any Banks that we may use in the

process of our business. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

- 4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.3 The hosting facilities for our website or email services maybe situated in countries outside the EEA. The European Commission has made an "adequacy decision" with respect to the data protection laws of these countries. Transfers to these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- 5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use or misuse of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. However, we will retain your personal data for unlimited time in full for historical reasons relating to products/services you purchased from us. Your full data maybe reduced to the minimum necessary by deleting, upon your request contact data such as your address, telephone number, email address etcetera.
- 6.3 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention.
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

8. Your rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data via email only. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the

verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent (by freely volunteering your data to us) OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR marketing activities. In particular, no consent is sought for marketing purposes, as [Recital 47](#) of the GDPR states: "*The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest.*"
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us. Such notice will be considered received only when acknowledged in writing by us or if you send by post and obtain a valid receipt from the post office.

9. Our details

- 9.1 Our website, www.jivetime.co.uk, is owned and operated by Franco Gareddu and Rebecca Olsen. We organise dance events in UK and abroad.
- 9.2 We are registered in UK for tax purposes. Our registered office is at 40 Stubbs Wood, Amersham, Buckinghamshire, HP6 6EX.
- 9.3 Our principal place of business is at the above address.
- 9.4 You can contact us:
- (a) by post, to the postal address given above;
 - (b) using our website contact form or email link;
 - (c) by telephone, on the contact number published on our website from time to time;
 - (d) by email, using the email address published on our website from time to time.

10. Data protection officer

- 14.1 Our data protection officer's contact details are: Franco Gareddu and Rebecca Olsen. 40 Stubbs Wood, Amersham, Buckinghamshire, HP6 6EX. Our email address and telephone number are as published on our website from time to time.

This is a live document, which may be changed from time to time, as and when required by us without notification to any party.