

## **Dancing in the Rain Data Protection Policy: Policy statement**

This policy 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.

Dancing in the Rain recognises that its first priority is to avoid causing harm to individuals. Dancing in the Rain will:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held

### **Definitions**

The Data Controller is the legal 'person', or organisation, that determines the purposes and means of collecting personal data. The data controller is responsible for complying with the General Data Protection Regulations 2018. Dancing in the Rain is the Data Controller.

The Data Protection Officer is the name given to the person in organisations who is the central point of contact for all data compliance issues. For Dancing in the Rain, this is Jeanette Shaw.

The Data Processor is the person responsible for processing data on behalf of the controller and has to comply with specific legal obligations. For Dancing in the Rain, this is Jeanette Shaw.

The Data Subject is the individual whose personal data is being processed.

Processing means the use made of personal data including:

- collecting and retrieving
- storing, whether in hard copy or electronically, and including backup copies
- accessing, using (sorting/analysing) or sharing, including outside of the organisation
- disposing of

### **Information Collection and Use**

- **Website/API contact:** When you contact us through the website, we might ask you to provide personal data to us. We ask for your contact information. You don't have to provide us with personal data, but some parts of our websites or services may not work;
- **Automatic collection:** When you visit our website or use our services, we collect information like IP address, device type and browser information. We also collect information when you navigate through our websites and services, including what pages you loaded and which links you clicked on. This information is used to help us understand how you are using our websites and services in order to improve user experience. Some of this information is collected using cookies and similar tracking technologies.

- Online Booking system provided by [Timely](#). We collect relevant information at the time of booking to enable us to provide you with the correct service at the correct time, day and venue.
- Facebook contact: When contacting Dancing in the Rain via Facebook, information you provide is held by Facebook in accordance with their [policies](#).
- Email contact: When contacting Dancing in the Rain by email, information is collected and stored in accordance with Yola [privacy policy](#)
- Telephone contact, including text: When contacting Dancing in the Rain, personal information is collected in accordance What's App [Privacy Policy](#), when using this method of communication or Google's [Privacy Policy](#) for text messages and phone calls.
- Telephone contact details are saved to Gmail in accordance with their [privacy policy](#)
- Payment information: Debit and Credit card payments are provided by IZettle in accordance with their [privacy policy](#)
- Relevant sensitive data will be collected at all face to face complementary therapy treatments to ensure any services provided are suitable for the client. This information is used to provide continuity of treatment and record accurate details of the treatment.
- This data will be hard copy only and not be held electronically.
- Relevant sensitive data will be collected for all Nordic Walking clients to ensure any services provided for the client are suitable. In case of emergency, this information needs to be accessible at the time of delivery and will be held on the Timely booking system.
- Online EFT therapy and Tiny Toes Baby Reflexage sessions are available. During these sessions, sensitive data may be transmitted verbally through the online meeting platform. The methods used for this online connection are chosen by the data subject and can include 'Jitsi Meet', 'Google Hangouts', 'Zoom Meet' and/or 'What's App' Video Call. Any sensitive data collected during these meetings by the Data Processor will be transferred to a hard copy. Any online data collected by the meeting hosting platform will be held in accordance with their privacy policy.

## **How we use your data**

The collected personal and sensitive data will be used in a number of ways:

- To ensure all treatments are safe and effective for you
- To communicate with you. This includes:  
Providing you with information you have requested from us or information we are required to send to you;
- Operational communications, like changes to our services or appointments
- Marketing communications in accordance with your marketing preferences;
- Asking you for feedback or to take part in any survey we are conducting (which we may engage a third party to assist with);
- To support you. This may include sending relevant information about treatments and/or research on conditions relevant to you.
- To enhance our services and develop new ones. By tracking and monitoring your use of websites and face to face services, we can keep improving by carrying out technical analysis of your data;
- The debit/credit card information will be solely used to collect payment from you.
- We use a third-party service provider to manage debit/credit card processing. This service provider is not permitted to store, retain, or use information you

provide except for the sole purpose of debit/credit card processing on our behalf;

- Any other way when we have your consent.
- We will keep confidential any confidential information you provide to us and will not disclose it to anyone unless we are required to do so by law or regulatory authority.

## **Data Processing Recording and storage**

Dancing in the Rain will only process information when it has a legal basis to do so, namely:-

1. Consent – genuine consent that offers individuals real choice and control
2. Contract – processing to fulfil contractual obligations
3. Legal obligation – processing in order to comply with a common law or statutory obligation

Dancing in the Rain databases hold basic information about all clients and sensitive information about all Nordic Walking clients. This information is held on 'Get Timely' booking system - to see their GDPR compliant privacy policy, please click [here](#). Dancing in the Rain accesses this app through a mobile phone and tablet, both of which are encrypted and are password protected.

The Timely app is also accessed through a desktop computer which has security protection that is updated as required.

Dancing in the Rain will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- The database systems are reviewed and re-designed, where necessary, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary.
- Effective procedures are in place so that all relevant systems are updated when information about any individual changes.
- Data will be corrected, if shown to be inaccurate.

Dancing in the Rain stores current and archived paper records of clients securely in the building. Archived paper records are retained for the length of time (seven years) required by regulators and the law and are then disposed of confidentially.

## **Security issues relating to personal and sensitive data**

Any recorded information on clients will be:

- Hard copy records will be kept in locked cabinets, key holders are Jeanette M Shaw of Dancing in the Rain and Mr Barry Shaw. Mr Shaw will not access the cabinet, unless required to do so to remove and destroy confidentially sensitive data, in the absence of Jeanette M Shaw.
- Limited to only what is required and justifiably needs to be recorded
- Protected by the use of passwords if kept on computer
- Destroyed confidentially, if it is no longer needed
- Access to IT systems are password protected and within those systems, access to information on the databases is controlled by a password and only those needing access are given the password.

## Sharing with partner organisations

Data will only be shared with partner organisations as part of the following booking, meeting platforms, calendar, payment or contact systems:

- email (provided by [Yola Mail](#))
- Calls and SMS (provided by [Googlemail](#)) and [What'sapp](#))
- [Facebook](#)
- website (provided by [Yola](#))
- online calendar (provided by [Googlemail](#))
- Online meeting platforms provided by [What's App](#), [Jitsi](#), [Zoom Meet](#), [Google Hangouts](#)
- Card Payment Facility [IZettle](#)
- Online booking and communication system [Timely](#).
- Newsletter and marketing distribution (provided by [Mailchimp](#))

## Access to data

All clients and customers have the right to request access to all information stored about them. Any subject access requests will be handled by the Data Protection Officer within one month.

Subject access requests must be in writing, this can include e-mail.

Where the individual making a subject access request is not personally known to the Data Protection Officer, their identity will be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person. This information will be provided free of charge unless it is manifestly unfounded or excessive, particularly if it is repetitive.

All individuals have the right to request, verbally or in writing, for inaccurate information to be rectified and or completed if inaccurate and Dancing in the Rain will respond within one calendar month.

Individuals have the right to request verbally or in writing for their information to be permanently deleted and dancing in the Rain will respond within one calendar month.

Please note, details of treatments carried out are legally required to be held for seven years following last treatment and as such cannot be erased in that time.

This will be hard copy only and does not apply to any online personal data which will be deleted if requested.

Dancing in the Rain will keep a register of Access Requests.

## Transparency and Consent

Dancing in the Rain is committed to ensuring that, in principle, Data Subjects are aware that their data is being processed and:

- for what purpose it is being processed;

- what types of disclosure are likely; and
- how to exercise their rights in relation to the data.
- Information will be clear and prominent; give sufficient information in order for individuals to make a choice; explain how the data will be processed and how their data will be used.

Data Subjects will generally be informed when they access the website or request services.

Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why. We will always ask individuals to positively opt-in.

## **Personal Data Breaches**

Upon suspicion of evidence of a breach, Dancing in the Rain will attempt to contain it and assess the potential adverse consequences for the individual, based on how likely and serious they are. If it is determined there is a likelihood of a serious risk to people's rights and freedoms, then the Information Commissioner's Office will be informed, within 72 hours, if feasible.

We will also inform individuals concerned directly and without delay. We will tell them the name of the Data Protection Officer, a description of the likely consequences of the breach and a description of the measures taken, or proposed to be taken, that might mitigate any possible adverse effects.

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[www.dancingintherain.co.uk](http://www.dancingintherain.co.uk)