



Website Privacy Policy

The policy: This privacy policy is for this website; www.twistedcheeranddanceco.uk and served by Twisted Cheer and Dance and governs the privacy of its users who choose to use it. It explains how we comply with the GDPR (General Data Protection Regulation), the DPA (Data Protection Act) [pre GDPR enforcement] and the PECR (Privacy and Electronic Communications Regulations).

This policy will explain areas of this website that may affect your privacy and personal details, how we process, collect, manage and store those details and how your rights under the GDPR, DPA & PECR are adhere to. Additionally it will explain the use of cookies or software, advertising or commercial sponsorship from third parties and the download of any documents, files or software made available to you (if any) on this website. Further explanations may be provided for specific pages or features of this website in order to help you understand how we, this website and its third parties (if any) interact with you and your computer / device in order to serve it to you. Our contact information is provided if you have any questions.

The DPA & GDPR May 2018

We and this website complies to the DPA (Data Protection Act 1998) and already complies to the GDPR (General Data Protection Regulation) which comes into affect from May 2018. We will update this policy accordingly after the completion of the UK's exit from the European Union.

Use of Cookies

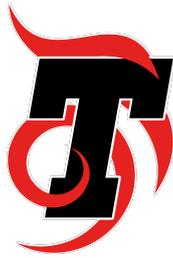
This website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

What are cookies? Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

Website Visitor Tracking

This website uses tracking software to monitor its visitors to better understand how they use it. The software will save a cookie to your computers hard drive in order to track



and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertisers website through a referral program which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computers hard drive. Users should therefore note they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Downloads & Media Files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti virus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti virus software or similar applications.

Contact & Communication With us

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in 'The policy' above.

Email Mailing List & Marketing Messages

We operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Users can subscribe through an online automated process where they have given their explicit permission. A subscriber's personal details are collected, processed, managed and stored in accordance with the regulations named in 'The policy' above. Subscribers can unsubscribe at any time by contacting us at info@twistedcheeranddance.co.uk. The type and content of marketing



messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Email marketing messages may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

External Website Links & Third Parties

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website.

Shortened URL's; URL shortening is a technique used on the web to shorten URL's (Uniform Resource Locators) to something substantially shorter. This technique is especially used in social media and looks similar to this (example: <http://bit.ly/zyVUBo>). Users should take caution before clicking on shortened URL links and verify their authenticity before proceeding.

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Policy & Usage

We adopt a Social Media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms users are advised to verify authenticity of such profiles before engaging with, or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page. You can find further information about some social media privacy and usage policies in the resources section below.

v.3.0 March 2020 Adopted by: Twisted Cheer & Dance.



Data Protection Policy

GDPR

GDPR came into force on the 25th May 2018, there is a 12 step guide available to view from the Information Commissioners Office (ICO) here: <https://ico.org.uk/media/1624219/preparing-for-the-gdpr-12-steps.pdf>

GDPR basically gives increased privacy rights to individuals whose data is being collected. It allows them to control their data and request that it be deleted.

Policy statement

Twisted Cheer and Dance (TCD) is committed to a policy of protecting the rights and privacy of individuals, members, volunteers staff and others in accordance with The Data Protection Act 1998. The policy applies to all voluntary, members and staff at the TCD. Any breach of The Data Protection Act 1998 or TCD's Data Protection Policy is considered to be an offence and in that event, disciplinary procedures apply.

As a matter of good practice, other organisations and individuals working with TCS, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that any staff who deal with external organisations will take responsibility for ensuring that such organisations abide by this policy.

Legal Requirements

Data is protected by the Data Protection Act 1998, which came into effect on 1 March 2000. Its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is processed without their consent.

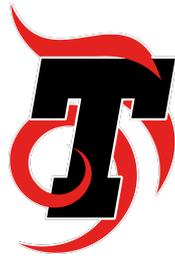
Purpose of data held by TCD.

Data may be held by us for the following purposes:

There are many reasons why TCD will need to store members personal data.

- TCD will need to take register of all members that attend each session for safety reasons.
- We will also need all member to fill out an emergency contact form which will only be kept on file for the duration of your time at TCD, after which will be destroyed.
- Your details will also be registered with each event we attend purely for the event providers to know who is attending and which age category you fall into, the information they will need is minimal.
- TCD will also ask permission to take photographs and videos for the website, social media and also promotional materials such as flyers and posters.

TCD will make sure it keeps a record of all data received from its members and where the data is being shared. We will also ask all members to sign consent forms for any data which we require.



1. Data Protection Principles

In terms of the Data Protection Act 1998, we are the 'data controller', and as such determine the purpose for which, and the manner in which, any personal data are, or are to be, processed. We must ensure that we have:

2. Fairly and lawfully processed personal data

Will always put our logo on all paperwork, stating their intentions on processing the data and state if, and to whom, we intend to give the personal data. Also provide an indication of the duration the data will be kept.

3. Processed for limited purpose

We will not use data for a purpose other than those agreed by data subjects (members, staff and others). If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects (members, staff and others) agree. Also external organisations must state the purpose of processing, agree not to copy the data for further use and abide by The Data Protection Act 1998 and (Jeannette's Academy of Cheerleading) Data Protection Policy.

4. Adequate, relevant and not excessive

TCD will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held. If data given or obtained are excessive for such purpose, they will be immediately deleted or destroyed.

5. Accurate and up-to-date

We will request updated contact details, medical information and video and photo consent forms at the beginning of each season. All amendments to information previously stored will be made immediately, and data no longer required will be deleted or destroyed. It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date. Completion of an appropriate form (provided by us) will be taken as an indication that the data contained are accurate. Individuals should notify us of any changes, to enable personnel records to be updated accordingly. It is the responsibility of the Association to act upon notification of changes to data, amending them where relevant.

6. Not kept longer than necessary

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us after one year of non membership has elapsed.



7. Processed in accordance with the individual's rights

All individuals that TCD hold data on have the right to:

- Be informed upon the request of all the information held about them within a month.
- Prevent the processing of their data for the purpose of direct marketing.
- Compensation if they can show that they have been caused damage by any contravention of the Act.
- The removal and correction of any inaccurate data about them.

8. Secure

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

All TCD computers have a log in system and our Contact Database is password protected, which allow only authorised staff to access personal data. Passwords on all computers are changed frequently. All personal and financial data is kept in a locked filing cabinet and can only be accessed by the Head Coach. When staff members are using the laptop computers out of the office care should always be taken to ensure that personal data on screen is not visible to strangers.

9. Not transferred to countries outside the European Economic Area, unless the country has adequate protection for the individual.

Data must not be transferred to countries outside the European Economic Area without the explicit consent of the individual. The academy takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe. This is because transfer includes placing data on a web site that can be accessed from outside the European Economic Area.

10. Processing Data

GDPR requires TCD to document why we need to lawfully process people's data. This includes the information we keep, what it is being used for and our reasons for needing it.

We have the following reasons for processing people's data –

- Legal - we have the following legal obligations for processing data which include but are not limited to health and safety, insurance and child protection.
- Contractual - which allows TCD to provide members with the services associated with our programme such as sending requests for payment, registers, and entrance to events.
- Legitimate interests – which is when the processing is necessary for TCD's legitimate interests such as but not limited to marketing.



- Consent – Is when the individual has given clear consent for you to process their personal data for a specific purpose. For example taking photographs for TCD website, social media and advertising.

Data collected from members, parents/guardians includes the following:-

- Name, address, date of birth, telephone numbers, two next of kin details and email address.
- Family Doctors details.
- Health Records
 - 1 Pre-existing medical conditions.
 - 2 Allergies.
 - 3 Any medication currently being taken.
- Various communications where members may be mentioned by name.
- Emails, text, phone calls, post.
- Records of Financial Transactions that have taken place.

The reasons for needing the above information is covered in section B under Processing Data. The data will be collected directly from members, parents/guardians. The data collected will be shared with staff at TCD and Event Providers.

The designated data controller at TCD is Head Coach Ben Vasey.

Email Address: info@twistedcheeranddance.co.uk

Telephone Number: 07510319436

Data Retention & Deletion Policy

TCD is committed to the safeguarding and well-being of its members and have measures in place for storing it's members data. This policy will outline how data is stored and deleted and the time period that the academy keeps hold of its members data.

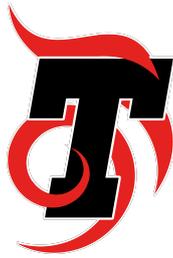
Data Storage

TCD only holds necessary data on its members. When a member joins TCD, they will be given a number of forms to fill in which include asking for the following information:

- ◆ Contact information, Personal Information such as DOB, Name, Age, etc
- ◆ Emergency contact information
- ◆ Consent for photography and videography
- ◆ Data processing consent form.

Once these forms are filled in and returned they will be kept in a locked filing cabinet. The emergency contact forms will be necessary to bring to practise and taken to competitions, in the event of an emergency. Security measures are outlined in our Data Protection Policy.

Data Deletion and Retention



We discourage the retention of data for longer than is required. All personal data will be deleted or destroyed by us after one year of non-membership has elapsed. Members details will only reappear if they become affiliated to TCD again. We will give members pre-warning that their data is about to be deleted via email, with a time frame of two weeks to change their mind.

Data can be deleted at any time by emailing info@twistedcheeranddance.co.uk