



Data Protection & Privacy Policy

Introduction:

Freedom Fighters Arts is committed to protecting you and your dependents' personal information. We are committed to providing a safe environment for all our customers, employees, casual and freelance workers and everybody who comes into contact with us, both physically and virtually (online). This Privacy Statement relates to the use of any personal information provided to us online or via application forms, telephone, email exchange, letters or correspondence. Whenever you provide such information, we are legally obliged to use your information in line with current legislation concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulations.

Data Protection Principles

The legislation sets out various data protection principles. These include that personal information is:

- Used fairly and lawfully
- Used for limited, specifically stated purposes
- Used in a way that is adequate, relevant and not excessive
- Accurate
- Kept for no longer than is absolutely necessary
- Kept safe and secure
- Not transferred outside the European economic area without adequate protection

Your rights

The legislation conveys various individual rights. These include the following:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

What information does Freedom Fighters Arts have about me?

The legislation requires that there is a clear legal basis for processing personal information. In general Freedom Fighters Arts relies on the individual's consent in order to process their data. Freedom Fighters Arts may collect and store personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number and date of birth, depending on how you are engaging with us. By submitting your details, you enable us to provide you with the products or services that you have selected. Freedom Fighters Arts may use images resulting from the photography/video filming, and any reproductions or adaptations of the images for fundraising, publicity or other purposes to help achieve the group's aims. This might include (but is not limited to), the right to use them in their printed and online publicity, social media, press releases and funding applications. Freedom Fighters Arts does not share your personal information with third parties, unless clearly stated. We do not sell your data, and neither do we buy data from third parties.

How long will we keep personal information?

We will keep the information we hold about our customers for as long as you are an active customer, to deliver the services we are providing you with. Once not attending our classes for a month, we will make you an inactive customer on our database and inform you of this change. However, we will retain your information for no more than 5 years after you have left, for promotional purposes and future offers. You always retain the right to request removal of your information from our database, which should be requested via email.

What are cookies and how do you use them?

Cookies are text files that websites place on your own computer to store information specific to you. Our website does not use cookies.

How will you use my personal information?

We will use your personal information for a number of purposes including:

- To provide you with information about our products, services and activities and to deal with your requests and enquiries, including complaints
- For "service administration purposes", which means that we may contact you for reasons related to the service or activity you signed up for (e.g., change of details regarding a class you attend, etc.)
- To contact you about an application you have made
- To process your application for employment and where applicable your employment once appointed
- As and when we need to use your personal information for reasons other than the ones specified above, we will ensure that we notify you first. You will be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

Use of data processors

Data processors are third parties who provide services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. The following is a list of our main data processors.

Website hosting

We use a third party service, Wix, to host our website. Such website host providers are contractually obliged to treat any information on our website as confidential and only use such information for the purpose of providing Freedom Fighters Arts with web hosting.

DBS/CRB Service

A DBS checking service for Freedom Fighters Arts staff is provided by CRB Direct and/or Ucheck. Information provided by them to Freedom Fighters Arts will only be shared with the individual concerned.

Suppliers/Third Parties

We use an Administration software (third party) called Class Manager to complete class registers, send emails and invoices, etc. As stated with our website host, this professional company is contractually obliged to treat any information on our business account as confidential and only use such information for the purpose of providing Freedom Fighters Arts with administration assistance.

Freedom Fighters Arts may contact you:

- To send you relevant communications for payment of fees and changes to classes
- In relation to any service or activity you have signed up for
- In relation to any correspondence we receive from you or any comment
- To send you information you requested when you voluntarily contacted us via our website
- A complaint you make about our products or services

Where is the information stored?

We use secure technologies to help protect your personal information from unauthorised access, use or disclosure. We store personal information you provide on computer systems which have carefully controlled access and which are located in secure facilities. The security measures described above ensure that all reasonable steps are taken to protect your personal information. However, the nature of the Internet means that an absolute guarantee of security cannot be offered, and, as with all internet transactions, you should be aware that there may be a small security risk when disclosing information online.

Can I find out what personal information Freedom Fighters Arts holds about me?

You have the right to access certain personal information held about you. If you wish to make a Data Subject Access Request, please contact us via the email on our website.

Legal Obligation

We may disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request.

Freedom Fighters Arts GDPR Policy

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by the EU Parliament in 2016 and came into effect on 25th May 2018. GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals' data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Freedom Fighters Arts is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors and staff personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

General Data Protection Regulation Policy Statement:

1. The right to be informed:
Freedom Fighters Arts is required to collect and manage certain data. We need to know parent's names, telephone numbers, email addresses and their children's full names, date of birth and any medical information. Addresses are also needed for our online portal registration but are otherwise unnecessary. Although our teachers are freelance, Freedom Fighters Arts is required to hold data on its teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers and in some cases, photographic ID such as passport and driver's license, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to CRB and/or UCheck for the processing of DBS checks. DBS Numbers and date of issue are also held on record.
2. The right of access:
At any point an individual can make a request relating to their data and Freedom Fighters Arts will need to provide a response (within 1 month). Freedom Fighters Arts can refuse a request, if we have a lawful obligation to retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.
3. The right to erasure:
You have the right to request the deletion of your data where there is no compelling reason for its continued use. However Freedom Fighters Arts has a legal duty to keep children's and parents' details for a reasonable time. Staff records must be kept for 6 years after the member leaves, before they can be erased. This data is archived securely onsite and shredded after the legal retention period.
4. The right to restrict processing:
Parents, visitors and staff can object to Freedom Fighters Arts processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.