



### 1. About this Policy

1.1 This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [www.cambridgekungfu.com](http://www.cambridgekungfu.com) regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

### 2. Who are we?

2.1 We are Cambridge Kung Fu Ltd. (CKF) We can be contacted at [email@cambridgekungfu.com](mailto:email@cambridgekungfu.com), 31c Clifton Road, Cambridge CB1 7EB and 01223 410555.

### 3. What information we collect and why.

Type of Information	Purposes	Legal Basis of Processing
Member's (and potential member's) contact details including Name, Address, Phone Numbers, E-mail Address(es). In the event that a member is a child this refers to a parent/guardian and their relationship to the child.	Managing the member's membership of CKF. Contacting potential members, that have expressed interest in joining, with details of classes and offers to attend. Communicating with members any relevant class details including dates/time changes, grading details etc. Contacting next of kin in the event of emergency. Managing demand for our services in different geographical locations.	Performing the CKF's contract with the member, or potential member. For the purposes of our legitimate interests in operating CKF. Protecting the member's vital interests.

	Managing waiting lists and interested parties of our services.	
Date of birth / age related information, including school year in the event of a child.	Ensuring members are offered appropriate classes/events at appropriate times. Managing membership categories which are age related.	Performing CKF's contract with the member.
Gender of member.	Provision of adequate facilities for members.  To maintain diversity data and ensure instructors are informed about their students.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
Contact details for a second person, and in the event that the member is a child this refers to a parent/guardian and their relationship to the child.	Contacting next of kin in the event of emergency.  Managing the member's membership to CKF if the first contact is not available.	Performing the CKF's contract with the member. For the purposes of our legitimate interests in operating CKF.  Protecting the member's vital interests.
Emergency contact details including Name, Phone Numbers, and the relationship to the member.	Contacting next of kin in the event that the main contacts are unreachable in the case of emergency.	Protecting the member's vital interests and those of their dependants
Member's grading scores/results.	Allocating appropriate staffing for grading sessions.  Helping instructors track the progress of their students.  Managing the syllabus of the club.	For the purposes of our legitimate interests in organising gradings for our members. For the purposes of our legitimate interests in operating the Club.
Photos and videos of members.	Putting on the CKF website and social media pages and using in press releases.	Consent. We will seek the member's consent on their details form and the member may withdraw their consent at any time by contacting us by e-mail or letter.
Bank account details of the member or other person making payment to CKF. Only collected if the provision of services and events is paid for via Direct Debit.	Managing the member's payments to CKF.	Performing the Club's contract with the member.
Records of past payments made	Managing the member's	Performing the Club's contract

between the member and CKF as well as future owed payments.	payments to CKF and ensuring membership is up to date. Keeping a trackable history in case of dispute.	with the member.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction at the CKF. Maintaining compliance with staffing/recruitment obligations from venues, schools and other customers.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members/customers.
Work history and pay history of all staff members.	To manage the running of a business and allow for accurate and necessary accounting records.	Performing CKF's contract with staff members in providing employment/volunteering opportunities.
Any medical/behavioural information that the member, or the member's guardian, has felt appropriate to share with CKF.	Managing the service provided to the member. Ensuring instructors are given all necessary information to provide the best quality classes in a safe manner for each member.	For the purposes of our member's legitimate interests in receiving safe and appropriate services.. For the purposes of our legitimate interests in providing the best possible service to our members..
Details of representatives of suppliers to the CKF.	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers.

#### 4. How we protect your personal data

4.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### 5. Who has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract

in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

5.3 All data is stored in a secure format either digitally or hard copies, including password and access restricted databases, servers and locked filing cabinets. Only current employees that need to access the data are given restricted access which is monitored and reviewed regularly.

## **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems for as long as you are a member of the CKF and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## **7. Your rights**

7.1 You have rights under the GDPR:

- (a) to access your personal data
- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to [email@cambridgekungfu.com](mailto:email@cambridgekungfu.com).