



## OUR PRIVACY POLICY

The Trampoline Academy whose registered address is 51 Bridgeacre Gardens Coventry CV3 2NQ holds personal information about individuals such as staff, students, parents, customers and members, volunteers and others, defined as data subjects in accordance with the General Data Protection Regulation (GDPR)

Such data must only be processed in accordance with this Privacy Policy and the purposes for which the Company holds and processes personal data. This Privacy Policy applies regardless of where the data is held.

## WHAT THIS PRIVACY POLICY IS FOR

This policy is intended to provide information about how the Company will use (or “process”) personal data about individuals including: its staff & volunteers; its current, past and prospective students; and their customers, parents, carers or guardians (referred to in this policy as “parents”). This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, volunteers, parents and students are all encouraged to read this Privacy Notice and understand the Company’s obligations to its entire community.

This Privacy Policy applies in addition to the Company’s other relevant terms and conditions and policies, including:

- any contract between the Company and its staff, volunteers, suppliers or the parents of students
- the Company’s policy on taking, storing and using images and video of children
- the Company’s safeguarding, child protection, or health and safety policies, including as to how accidents, complaints or incidents are recorded
- the Company’s IT and social media policies



Anyone who works for, or acts on behalf of, the Company (including staff, volunteers and service providers) should also be aware of and comply with this Privacy Notice.

## **RESPONSIBILITY FOR DATA PROTECTION**

The Company has appointed Natalie Yorke-Goldney as Head of Data Protection who will deal with all your requests and enquiries concerning the Company's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law [nyg.safety@gmail.com](mailto:nyg.safety@gmail.com)

## **WHY THE COMPANY NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its ordinary duties to staff, students and parents, customers and members, the Company needs to process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation.

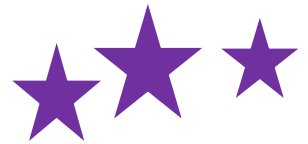
Some of this activity the Company will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its students.

Other uses of personal data will be made in accordance with the Company's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The Company expects that the following uses will fall within that category of its

### **"legitimate interests":**

- For the purposes of student applications and selection (and to confirm the identity of prospective students and their parents



- To provide our services and monitoring students progress and educational needs
- Maintaining relationships with former parents and the Company community, including direct marketing
- For the purposes of due diligence, and to confirm the identity of prospective staff & volunteers and their background and relevant interests
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis)
- To enable relevant authorities to monitor the Company's performance and to intervene or assist with incidents as appropriate
- To give and receive information and references about past, current and prospective customers, including relating to outstanding fees or payment history, to/from any collections agency
- To enable students to take part in external events or competitions (including passing student information to event organisers or governing bodies), and to publish the results of the events or other achievements of students of the Company
- To safeguard students welfare and provide appropriate care
- To monitor (as appropriate) use of the Company's IT and communications systems
- To make use of photographic images and video of staff, volunteers, students & prospective students, parents, customers, prospective members & members, and others, defined as data subjects in Company's marketing, publications, on the Company's website and on the Company's social media channels in accordance with the Company's policy on taking, storing and using images & video
- For security purposes, including CCTV  
To carry out or cooperate with any Company or external complaints, disciplinary or investigation process; and



- Where otherwise reasonably necessary for the Company's purposes, including to obtain appropriate professional advice and insurance for the Company

In addition, the Company will on occasion need to process special category personal data (concerning health, ethnicity, religion, or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students welfare and provide appropriate (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of Company trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a student;
- To provide spiritual support in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare and occupational health services, and pension plans;
- As part of any Company or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

## **TYPES OF PERSONAL DATA PROCESSED BY THE COMPANY**

This will include by way of example:



- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. about parents who pay fees to the Company
- past, present and prospective students syllabus levels, disciplinary, injuries, admissions and attendance records (including information about any special needs), and award levels;
- Staff and volunteer personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin
- correspondence with and concerning staff, students and parents past and present; and
- images and video of pupils, their parents (and occasionally other individuals) engaging in Company activities, and images & video captured by the Company's CCTV system;
- Data about how you use our website
- Technical data such as the IP address, you log in data, details about your browser, length of visit to pages on our website, page views, navigation paths, details about the number of times you use our website, timezones settings and other technology on the devices you use to access our website
- Your marketing preferences
- Credit information from 3rd parties

#### **HOW THE COMPANY COLLECTS DATA**

Generally, the Company receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via telephone and online form, or simply in the ordinary course of interaction or communication (such as email or web chat, or social media).

However in some cases personal data will be supplied by third parties (for example another Company, or other professionals or authorities working with that individual); or collected from publicly available resources.



We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Company website become inaccessible or do not function correctly. For more information about the cookies we use please visit [www.ukflair.com](http://www.ukflair.com)

### **MARKETING COMMUNICATIONS**

Our lawful ground of processing your personal data to send you marketing is either your consent of our legitimate interests (namely to grow our business)

Under the privacy and Electronic Communications Regulations we may only send you email or text marketing communications if:

- You made a purchase of asked for information from us about our goods or services; or
- You agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us or any third parties to stop sending you marketing messages at any time by emailing us at [thetrampolineacademy@gmail.com](mailto:thetrampolineacademy@gmail.com)

We also have unsubscribe buttons at the bottom of all our emails.



If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions such as purchases.

### **WEBSITE COOKIES**

When browsing a Company website, the website uses COOKIES.

You can set your browser to refuse all or some browser cookies, or to alert you when the websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Company's websites may become inaccessible or not function properly. For more information about the cookies the Company uses, please contact us directly.

### **WHO HAS ACCESS TO PERSONAL DATA AND WHO THE COMPANY SHARES IT WITH**

Occasionally, the Company will need to share personal information relating to its community with third parties, such as:

- Service providers who provide IT and system administration services
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, Department Of Education, police or the local authority);
- appropriate regulatory bodies
- Market Research and fraud prevention agencies
- Third parties to whom we sell, transfer or merge parts of our business or our assets

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions

For the most part, personal data collected by the Company will remain within the Company, and will be processed by appropriate individuals only



in accordance with access protocols (i.e. on a 'need to know' basis).  
Particularly strict rules of access apply in the context of:

- medical records;
- criminal record checks; and
- safeguarding files.

However, a certain amount of any SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and tuition that the student requires.

Staff, students and parents are reminded that the Company is under duties imposed by law and statutory guidance (including Keeping Children Safe in Sport) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO (Local Authority Designated officer) or police. For further information about this, please view the Company's Safeguarding Policy.

The Company uses internal monitoring software which collects the following information:

- the address or URL of any webpage which a user tries to access
- the words entered into a search engine and
- the fact that an attempt to access a restricted site has been made.

This information is logged against the username and stored by the Company and retained for one year after a data subject ceased to be a student or an employee as appropriate.

## **INTERNATIONAL TRANSFERS**

We personal data within our group of companies which involves transferring data outside of the European Economic Area (EEA)





We are subject to the provisions of the General Data Protection Regulations that protect personal data. Where we transfer data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for personal data. As such:

- We may transfer personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place' or
- Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer, You will have the right to withdraw this consent at any time.

### **HOW LONG WE KEEP PERSONAL DATA**

The Company will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personnel files is up to 7 years following departure from the Company.

And student files for 3 years following their 21st birthday in case of a personal injury claim made against the company. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Natalie Yorke-Goldney as



Head of Data Protection, please bear in mind that the Company will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a “suppression record”)

### **KEEPING IN TOUCH**

The Company will use the contact details of parents, students, alumni and other customers to keep them updated about the activities of the Company, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, which can be done by opting out of any or all mailing lists. The Company will also:

- Share personal data about students, parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the Company;
- Contact parents and/or alumni by post, email, messenger, telephone direct mail and social media with appropriate consent in order to promote the Company;
- Collect information from publicly available sources about parents’ and former students occupation and activities, in order to maximise the Company’s growth potential.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Natalie Yorke-Goldney as Head of Data Protection You always have the right to withdraw consent, where given, or otherwise object to direct marketing. However, the Company is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).



## YOUR RIGHTS

### •Rights of access

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Company, and in some cases ask for it to be erased or amended or have it transferred to others, or for the Company to stop processing it – but subject to certain exemptions and limitations.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should send their request by email to Natalie Yorke-Goldney as Head of Data Protection

The Company will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances

The Company will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the Company may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

### •Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to



be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the Company, or documents prepared in connection with a legal action).

The Company is also not required to disclose any student progress reporting, nor share any confidential reference given by the Company itself for the purposes of the education, training or employment of any individual.

You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child’s) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. All such requests will be considered on their own merits.

#### • Student requests

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Company, they have sufficient maturity to understand the request they are making (see section Whose Rights? below). A student of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child’s: for older students, the parent making the request may need to evidence their child’s authority for the specific request.

Students aged 15 years and older are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly



younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

• **Parental (customers and former customer) requests.**

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about students without their consent. The Company may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and welfare updates about their children. Where parents are separated, the Company will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning students – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

• **Consent**

Where the Company is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the Company may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Policy, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership has been requested)



### •Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the Company will often rely on parental authority or notice for the necessary ways it processes personal data relating to students – for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the Company relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the student’s age and understanding – to seek the student’s consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents’ rights at law or under their contract, and all the circumstances.

In general, the Company will assume that students consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student’s activities, progress and behaviour, and in the interests of the student’s welfare. That is unless, in the Company’s opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the Company may be under an obligation to maintain confidentiality unless, in the Company’s opinion, there is a good reason to do otherwise; for example where the Company believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others and staff are under professional duties to do the same covered under the terms of their employment contract.



## **DATA ACCURACY AND SECURITY**

The Company will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

Individuals must please notify the Natalie Yorke-Goldney as Head of Data Protection of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the Company may need to process your data, of who you may contact if you disagree.

The Company will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to Company systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **THIS POLICY**

The Company will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## **QUERIES AND COMPLAINTS**

Any comments or queries on this policy should be directed to the Natalie Yorke-Goldney as Head of Data Protection

If an individual believes that the Company has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the Company's complaints procedure and should also notify the Head of Data Protection. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the

ICO recommends that steps are taken to resolve the matter with the Company before involving the regulator.

**Policy Create & Revision Date/s**

15<sup>th</sup> December 2023

**Next Revision Date**

December 2025, or when additional GDPR rulings come into force