



## Privacy Policy

### Introduction

Creative Kitchen, recognises the trust you place in us when you share your personal data with us. We are committed to being open, honest and transparent with the use of personal data.

This privacy policy

And sets out to highlight what personal data or information we collect from you and how we store and use it.

If you have any questions about this privacy policy or how we handle your personal information, please contact us. If you have a concern about the use of your data, you can contact us by email at: [creativekitchenjemma@gmail.com](mailto:creativekitchenjemma@gmail.com).

Creative Kitchen is registered with the Information Commissions office, ICO under registration reference A8729019. Jemma Kennedy is named as the Data Controller for Creative Kitchen.

Creative Kitchen is aware of its legal duty to collect, store and process data lawfully. As a business we abide by the requirements of the Data Protection Act 2010 and the General Data Protection Act 2018. As so we follow the following Data Protection Principles;

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

This privacy policy outlines what personal data we collect and use about you and your children and any other individual's personal data that you supply us with in connection with the services we provide to you. This includes all personal data processed by us through direct mail, telephone or social media channels. This policy also covers how we collect and process personal data from prospective schools and other third parties as identified in the privacy policy. We will take all reasonable steps to ensure that personal data is safeguarded and kept in accordance with data protection law.

What personal data do we collect about you?

Personal information is information about an individual from which that person can be identified.

Outlined below is the different type of personal data we may collect, use, store and transfer when you engage with us.

- Identity data: Title, first name, surname, date of birth, age, company or organisation of you or your child.
- Contact data: Billing address, delivery address, telephone number and email address.
- Financial data: bank account and payment card details.
- Transaction data: details about purchases made by you and payments between us.
- Marketing and communications data: preferences in receiving marketing communications from us, our third parties and your communication preferences.

#### Sensitive data

Sensitive data, also known as special category data, includes data about race/ethnic origin, religious/philosophical beliefs, sexual orientation, sex life, political opinions, trade union membership, information about your health and genetic and biometric data). We do not collect any information about criminal convictions and offences.

Due to the nature of the activities we offer, we need to collect some sensitive data about the children attending our classes. We ask that Parents/Careers inform us of any health issues and food allergies or intolerances. We ask this in order to understand the needs of those children and in order to protect the vital interest of those children and or adults who attend our cooking workshops.

We only process data relating to children for the purpose of our Creative Kitchen workshops and is always with the consent of the parent/carer with legal responsibility. Sensitive data will only be processed with explicit consent.

Were we are required to collect personal data by law, or under the terms of the contract between us and you fail to provide us with that data when requested, we may have to cancel a service you have ordered but if we do, we will notify you at the time.

#### How do we collect personal data about you?

We may collect personal information from you and about you, through direct interactions by completing forms or communicating with us by email, post, phone, face to face or through social media or otherwise including when you: order our products or services, request a resource or marketing to be sent to you; enter a competition, promotion, prize draw, complete a survey or give us feedback.

## Information we get from other sources

From time to time we may receive personal data about you from third parties or publicly available sources including technical data from Facebook or Google analytics. Or data collected from schools regarding workshops within those schools. Other organisations such as workshops requested within the community, birthday party booking forms.

## How do we use your personal data?

We will only use your personal data where we are legally permitted to do so. Uses of personal data and the legal grounds on which we are processing such data are outlined below.

- To register you for a Creative Kitchen workshop. (Performance of a contract with you)
- To process, personalise and deliver services including managing payments/fees/charges and to collect and recover money owed to us. (Performance of a contract with you. Necessary for our legitimate interests to recover debts owed to us and to comply with health and safety obligations)
- To provide, manage and personalise our services to you and respond to communications. (Performance of a contract with you and to comply with health and safety obligations)
- To send email notifications which have been specifically requested. (Necessary for our legitimate interests)
- To send marketing communications where expressly agreed e.g. newsletters. (Necessary for our legitimate interests)
- To ask for a review of our workshops. (Necessary for our legitimate interests to grow our business and develop our products/services)
- **COVID-19 Tack and Trace. The government has asked those running clubs and its venues including community centres to collect and maintain records of customers and share them with NHS Track and Trace, if and when requested. This is so that the NHS teams can identify and inform those who may have been exposed to COVID-19 through close contact with somebody who has tested positive for the virus. As normal procedure we will complete a register for each workshop, which will only be shared with the NHS if and when required for the purposes of track and trace only. Your details will not be shared with any other third party.**

## Sharing data

We do not share, sell or distribute your data to any third parties, except contractually agreed with you.

## Marketing

We may carry out direct marketing through email, telephone, text or post where we have a lawful basis to do so. We will ask for your consent in receiving marketing communications when you register for a creative kitchen workshop. You have the right to give and withdraw consent at anytime by contacting Creative Kitchen by email: [creativekitchenjemma@gmail.com](mailto:creativekitchenjemma@gmail.com)

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## Change of purpose

We will only use your personal data for the purposes which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for a purpose unrelated to the original purpose, we will notify you and explain the legal reasoning behind it.

We may process your personal data without your knowledge or consent where is required or permitted by the law.

## Data retention, security and storage

We retain personal data only for as long as necessary to fulfil for the purposes we collected it, this includes meeting any legal, accounting or reporting requirements. By law, for tax purposes, we are required to hold basic data about customers for six years after they cease being customers.

Access to your data is limited to ourselves, parties we are legally obliged to share it with, and parties we have your permission to share it with. We have appropriate security measures in place to ensure your data is not accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to data is strictly limited to those employees, agents and contactors. Data will only be processed on our instruction and all are bound to a duty of confidentiality. We have procedures in place to deal with any suspected personal data breach and will notify you and the applicable regulators of a breach when we are legally required to do so.

All data we hold is stored securely, paper records are kept in locked storage, personal data is held on password-protected encrypted computer systems and your contact details are held on password protected mobile devices.

## Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

If you would like a copy of the information which we hold on you, please contact us by email. It is very important that the information we hold about you is up to date and accurate. Please do let us know if at any time your personal information changes by emailing us at: [creativekitchenjemma@gmail.com](mailto:creativekitchenjemma@gmail.com)

### Complaints

If you have any questions about this privacy policy or how we handle your personal information, please contact us. If you have a concern about the use of your data, you can contact us by email at: [creativekitchenjemma@gmail.com](mailto:creativekitchenjemma@gmail.com).

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. More information can be found at [www.ico.org.uk](http://www.ico.org.uk).

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information

This privacy policy is kept under regular review and was last updated September 2020.