

## Alloa Ballet Company Website Privacy & Cookie Policy

Alloa Ballet Company is committed to protecting and respecting your privacy when using Alloa Ballet Company's website.

This Privacy Policy is exclusively for your use of this website. If you are looking for our Confidentiality and Data Protection Policy (including EU GDPR), for using our *Services in-person* (not our website), you can find that here: [Alloa Ballet Company's Confidentiality and Data Protection Policy](#) (many of the clauses are the same).

### **EU GDPR**

On May 25, 2018 the European Union (EU) implemented the General Data Protection Regulation (GDPR) (Regulation (UE) 2016/679). This regulation is intended to strengthen and unify data protection for all individuals within the EU and addresses the export of personal data outside the EU.

To comply with the new regulations we, (Alloa Ballet Company), must inform you of the personal data we hold, why we hold it, who we share it with, where it is stored.

Your explicit permission is required.

You can opt-in or opt-out via our online parent portal,

If you opt-out, regrettably, you may be unable to access some or all of our services.

The privacy policy below provides information about:

- What happens to any personal information you provide us with;
- First-party and third-party cookies;
- How we use cookies;
- How you can **manage and block cookies**;
- How to contact us.

### Summary

**We do NOT collect or store any of your financial details on this website.**

We **do NOT** collect “**sensitive**” **personal data**, such as your health, medical (such as allergies) or learning support requirements on this website.

We **MAY** collect some **personally-identifiable data** from you, for example: we may need your name and email address if you contact us. However, you can use *most* of this website without giving us any personally-identifiable data.

We **DO** collect **anonymous statistical data**, such as, what search engines visitors use and which pages are popular, which helps us improve our website and services for you.

And we **DO** use **Cookies** for a number of actions, including: to help our website function, embed third-party content and gather anonymous statistical data.

## What are Cookies?

Cookies are not spam or malware. Servers need a way to keep track of which requests are made by which website visitor, such as clicking a link to a new page, loading a video, adding an item to your shopping cart, logging in to your account or leaving a comment on a blog post.

A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser and contains **anonymous** information such as a unique identifier and the site name and some digits and numbers.

Under the 2012 EU e-Privacy Directive, all EU websites must comply and make it clear what information they are collecting from visitors, specifically with cookies.

**Cookies do lots of different jobs**, like letting you navigate between pages efficiently, personalising content, storing your preferences and generally improving your experience of a website.

Cookies make the interaction between you and the website faster and easier and can also monitor anonymous statistics, such as how many visits a website has, which pages are visited and which browsers are used.

There are two types of cookies:

A. **Session Cookies** generally expire after thirty minutes or at the end of your visit.

B. **Persistent Cookies** are used for repeat visits and generally expire a year after your first visit, though some will remain active for longer.

And there are two types of *parties* that generate cookies:

- 1 **First-party Cookies** are set by the website you are visiting and can help to:
  - verify logged-in administrators, staff, editors, clients, subscribers, purchasers and users;
  - remember names and email addresses of those leaving comments;
  - remember registered email and newsletter subscribers and whether to display notifications valid to subscribed/unsubscribed users;
  - collect and remember user details or data submitted through forms (such as contact forms) for future correspondence.
  - process ecommerce orders or payments.

2. **Third-party Cookies** are set by other websites who:

- run content on the page you are viewing, for example, embedded content from websites such as YouTube, Twitter, Facebook, Pinterest, etc and/or targeted adverts, like Google Ads (we *don't* run these types of adverts on our website);
- or run software on the website, such as WordPress, security plugins, statistical software like Google Analytics, social media sharing plugins, etc.

So you can get First-party *Session* Cookies and First-party *Persistent* Cookies. Ditto for Third-party Cookies.

There is a useful [BBC Microsite](#) which explains Cookies.

You can disable cookies by adjusting settings in your browser. Please know that **disabling or blocking cookies will affect the functionality of this and many other websites that you visit**, though some browsers allow you to disable certain ones, like third-party cookies. Specific details in our privacy policy below.

**Instructions for managing / disabling cookies in different browsers** are at the bottom of the page.

Please note, we only collect data and use cookies to improve your experience as well as the products and services we offer to you.

## Privacy & Cookies Policy

### **OVERVIEW:**

This Policy applies as between you, the User of this Website, and Alloa Ballet Company, the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

### **1. Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

**“Data”** means collectively all information that you submit to Alloa Ballet Company via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 (UK) and the European Union General Data Protection Regulation (EU GDPR);

**“Cookie”** means a small, non-personally identifiable text file placed on your computer or mobile device by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;

**“Service/Services”** means in-person services provided by Alloa Ballet Company, such as dance tuition, classes, examinations, performances; digital services provided via this Website, such as blog articles, information, communication facilities and email newsletters; and the management of those services.

**“UK and EU Cookie Law”** means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 – [Documentation](#);

**“User/Visitor/You/Your/Pupil/Student”** means any third party that accesses the Website and is not employed by Alloa Ballet Company and acting in the course of their employment;

**“Website/Site”** means the website that you are currently using [Alloaballetcompany.co.uk](http://Alloaballetcompany.co.uk) and any sub-domains of this Site unless expressly excluded by their own terms and conditions; and

**“We/Us/Our”** means Alloa Ballet Company.

### **2. Scope of this Policy**

This Policy applies only to the actions of Alloa Ballet Company and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites

### **3. Data Collected and Held**

Alloa Ballet Company is committed to ensuring that the collection and processing of personal data is only undertaken in the legitimate operation of Our business. We collect and use the following Data for legitimate purposes only and Data is not disclosed to any third party unlawfully.

We and our Website does **NOT** collect or store financial information such as credit/debit card numbers.

Without limitation, any of the following Data may be collected:

#### **3.1 PERSONAL DATA:**

3.1.1 name and child/ren's name (if provided by you);

3.1.2 contact information such as email addresses, postal addresses and telephone numbers (if provided by you);

3.1.3 your messages (if provided by you);

#### **3.2 Non-personally-identifiable data collected via Our Website:**

3.2.1 IP address (automatically collected);

3.2.2 web browser type and version (automatically collected);

3.2.3 operating system (automatically collected);

3.2.4 a list of URLs starting with a referring site, and the site you exit to (automatically collected); and

3.2.5 your activity on this Website (automatically collected);

### 3.3 SENSITIVE DATA:

3.3.1 health, medical (such as allergies) or learning support requirements, *is only collected online via our secure parent portal, not via this website, and you may use alternative means to submit such data.*

No personally-identifiable information is used when:

ordering uniform, dancewear, costume and dance shoes;  
or when sharing photos on our website or on social media,

3.4 *In addition to choosing what Data you share, you may choose the way in which you share Data with us. Data is collected via:*

Paper forms

Digital forms

Email

Secure online forms using our parent portal

## 4. Our Use of Data

4.1 Alloa Ballet Company Data users must comply with the eight Data Protection Principles:

Personal data shall be processed fairly and lawfully.

Personal data shall be held only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or purposes.

Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Personal data shall be accurate and where necessary kept up to date.

Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.

Personal data shall be processed in accordance with the rights of data subject under the DPA.

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

Personal data shall not be transferred to a country or a territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4.1.1 Any personal Data you submit will be retained by Alloa Ballet Company .

4.1.2 Data provided by Users will NOT be sold to third parties.

4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your personal Data will NOT be disclosed to third parties.

4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.

4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Services. Specifically, Data may be used by us for the following reasons:

4.4.1 internal record keeping;

4.4.2 improvement of our products/services;

4.4.3 transmission by email or post of information regarding your use of Our Services;

4.4.4 illustrate, customise or update Our Services.

4.5 With your permission, **photographs and videos** of our Pupils, Students and Service Users are used for illustrative purposes on our website and may be used on our social media channels and marketing materials.

4.5.1 Photographs and videos of Pupils and Service Users under 18 will NOT have their names or other personally-identifiable data attached;

4.5.2 Photographs and videos of Students and Service Users over 18 MAY have their names attached.

## **5. Sharing Your Data: Third Party Websites and Services**

5.1 Alloa Ballet Company may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to:

- 5.1.1 Website use;
- 5.1.2 search engine facilities;
- 5.1.3 communications and newsletter transmission;
- 5.1.4 advertising and marketing;
- 5.1.5 feedback and reviews;
- 5.1.6 Service use.

Excluding our secure online parent portal (if health/medical data is provided by you), the providers of such services do **NOT** have access to sensitive Data provided by Users of this Website.

Third-party providers MAY have access to some personal Data provided by Users of this Website.

5.2 Third-Party providers for **in-person Service use** include:

5.2.1 Examination Boards:

ROYAL ACADEMY OF DANCE (RAD) Privacy Policy

INSTITUTE OF TEACHERS OF DANCE (ISTD) Privacy Policy

5.2.3 service providers:

Google (blank forms and marketing files): [Policies](#);

Dance Studio Pro (email, newsletters, digital registration forms) [Privacy Policy](#)

Fasthosts (website hosts) [Privacy Policy](#)

Clicky (log and analyze the traffic to our web site) [Privacy policy](#)

Updraft Plus (back up of website) [Privacy policy](#)

Wordfence (website security) [Privacy Policy](#)

Stripe (online platform for online payments) [Privacy Policy](#)

5.3 We may share personal and sensitive Data with Alloa Ballet Company employees and teachers.

A non-exhaustive list of further Third-Party providers, including digital Service use, and first-party Cookies use is within Clause 12.

5.4 Any Data used by such parties is used only to the extent required by them to perform the services that Alloa Ballet Company requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

5.5 Our online presence is managed by Heather Shrimpton, including website, newsletter and social media management and some promotional activities.

## **6. Confidentiality and Data Protection**

Use of Our in-person Services is also governed by Our Confidentiality and Data Protection Policy which is incorporated into this policy by this reference. To view Our Data Protection Policy, which incorporates Our use of Your Data We collect, please click on the link above.

## **7. Links to Other Websites**

This Website may, from time to time, provide links to other websites. Alloa Ballet Company has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

## **8. Controlling Use of Your Data**

8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

- 8.1.1 use of Data for direct marketing purposes;
- 8.1.2 sharing Data with third parties; and
- 8.1.3 taking photographs and video footage (see Clause 4).

## **9. Your Right to Withhold Information**

9.1 You may access most areas of Our Website and some of Our Services (without providing any Data at all.

9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12 of our Website Privacy and Cookie Policy.

### **9.3 Your explicit permission is required.**

9.3.1 You can opt-in or opt-out via our online parent portal.

9.3.2 You may "opt-out" of providing certain Data. If you opt-out, regrettably, you may be unable to access some or all of Our Services.

9.4 You may unsubscribe from Our mailing list at any time.

9.5 You may request your Data is rectified, restricted, blocked, erased or destroyed.

9.6 You may notify us of any change in Data permissions, for example, you may request photographs and videos to be removed from this Website by contacting Heather Shrimpton [lovetodance@sky.com](mailto:lovetodance@sky.com)

## **10. Your Rights and Accessing Your Own Data**

You have the right to ask for a copy of any of your personal Data held by Alloa Ballet Company (where such data is held) on payment of a small fee which will not exceed £10 (the statutory maximum).

## **11. Security**

11.1 Data security is of great importance to Alloa Ballet Company and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

11.2 You acknowledge it is impossible to construct "perfect internet security". This Website does not use encryption (such as SSL), however, we have other security measures in place and many of our third-party providers, such as our email service providers, use encryption.

## **12. Cookies**

### **12.1 All Cookies used by this Website are used in accordance with current UK and EU**

**Cookie Law.** Cookies are small, non-personally identifiable text files placed on your computer or mobile device which enable us to provide the best experience for you and continually improve our business. They perform tasks, such as loading a video, clicking a link to a new page, adding an item to your shopping cart, collecting and analysing anonymous usage statistics or logging in to your account.

12.2 As some Cookies are used in order for most modern websites to function, it can be difficult to obtain *prior consent* before any Cookies are placed on your computer. Therefore, subject to sub-Clause 12.5, you will be presented with a pop-up prompt requesting your consent to set our Cookies. By giving your consent to the placing of Cookies you are enabling Alloa Ballet Company to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however, certain features of the Website may not function fully or as intended.

12.3 This Website may place and access certain **First-party Cookies** on your computer. First party cookies are those placed directly by Alloa Ballet Company via this Website and are used only by Alloa Ballet Company. Alloa Ballet Company uses Cookies to improve your experience of using the Website and to improve our range of products services.

12.4 By using this Website you may receive certain **third-party Cookies** on your computer. Third party cookies are those placed by websites and/or parties *other* than Alloa Ballet Company. Third party cookies are used on this Website for website security, collecting statistical data (such as Clicky), marketing, embedding content and social media. The third-party providers are detailed below.

12.5 Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be “**strictly necessary**”, therefore consent is not required for the particular Cookies which perform functions, such as: providing essential security measures and quick loading and distribution of content. You may still block these cookies by changing your internet browser’s settings as detailed below.

12.6 This is a nonexhaustive **list of what the first party Cookies are used for**, which may be placed on your computer while using this website:

12.6.1 verify logged in administrators, staff, editors, clients, subscribers and users;

12.6.2 remember “names”, usernames and email addresses of those leaving comments;

12.6.3 remember registered email and newsletter subscribers and whether to display notifications valid to subscribed/unsubscribed users;

12.6.4 collect and remember user details or data submitted through forms (such as contact forms) for future correspondence.

12.7 This is a nonexhaustive **list of Third-Party providers, Alloa Ballet Company use them for** and links to **their privacy policies**, if they have one (a full list of current plugins available on request). Some or all of them may place Cookies on your computer while using this website (*please note **all analytics are anonymous statistics***):

Third-Party Providers

#### 12.7.1 **Core website software**

Wordpress (open source content management system software used to design, build and run our website) [Privacy Policy](#)

Fasthosts (website hosts) [Privacy Policy](#)

Updraft Plus (back up of website) [Privacy policy](#)

GDPR Cookie Compliance plug in ( provides

#### 12.7.2 **Analytics**

Clicky (provides tools to collect and analyse anonymous statistics for Alloa Ballet Company, such as: quantities of visitors, what country they are from, how many pages per visit, popular pages, which browsers are used. These tools enable us to understand how Users use the Website and improve the Website and the products and services.) [Privacy policy](#)

#### 12.7.3 Crossover tools – multiple uses

Wordfence (website security) [Privacy Policy](#)

Dance Studio Pro (email, newsletters, digital registration

Stripe (online platform for online payments) [Privacy Policy](#)

#### 12.7.4 **Social Media & Visitor Sharing Tools**

**Facebook** Privacy Policy Provides a plugin for visitors to view our posts; link to and “like” our Facebook page; shows profile pictures of people who “like” Alloa Ballet Company on Facebook; and enables advert targeting. Facebook’s Cookie Policy

**Instagram** Privacy Policy Owned by Facebook.

#### **12.7.5 Embedded Content & Miscellaneous**

**YouTube** YouTube is part of Google Privacy Policy Provides the ability to embed videos for our visitors to watch.

12.8 You can choose to **enable or disable Cookies** in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser and refer to the reference guide below.

12.9 You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

12.10 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

#### **13. Use of Communications Facilities and Posting Guidelines**

13.1 When using the enquiry form, or any other System on the Website You should do so in accordance with the following rules:

13.1.1 You must not use obscene or vulgar language;

13.1.2 You must not submit Content that is unlawful or otherwise objectionable. This includes, but is not limited to, Content that is abusive, threatening, harassing, defamatory, ageist, sexist or racist;

13.1.3 You must not submit Content that is intended to promote or incite violence;

13.1.4 You must not submit advertisements or promote Your business, products or services without the written permission of Alloa Ballet Company ;

13.1.5 It is advised that submissions referring to or containing material, including but not limited to text, quotes, images, designs, which does not belong to You or is not Your intellectual property must be accompanied by a sufficient acknowledgement of the intellectual property owner;

13.1.6 It is advised that submissions are made using the English language as We may be unable to respond to enquiries submitted in any other languages;

13.1.7 The means by which You identify Yourself must not violate these Terms and Conditions or any applicable laws;

13.1.8 You must not impersonate other people, particularly employees and representatives of Alloa Ballet Company or Our affiliates; and

13.1.9 You must not use Our System for unauthorised mass-communication such as “spam”, “phishing” or “junk mail”.

13.2 You acknowledge that Alloa Ballet Company reserves the right to modify, monitor, moderate, unapprove, remove or delete any and all communications made to us or using Our System.

13.3 You acknowledge that Alloa Ballet Company may retain copies of any and all communications made to us or using Our System.

Anyone in breach of these rules will have access to comment denied and their posts removed.

#### **14. Changes to this Policy**

Alloa Ballet Company reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.

Updated April 2019.