**PRIVACY POLICY**

What does this policy cover?

This policy describes how Create Mate (also referred to as "Create Mate", "we" "us" or "our") will make use of your and your child's data when you book or attend a class with us or when you buy a product or service from us.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

What information do we collect?

We collect and process personal data about you when you interact with us, and our website, attend one of our classes and when you purchase goods and services from us. This includes:

• your and your child's name

• your and your child's gender

• your child's age/date of birth

• any allergies you or your child may have,

• your marketing preferences, including any consents you have given

• any enquiries you submit to us

• any Create Mate affiliates' sample products you requested to receive

• your home address, email address and phone number

• any disability information where you would like us to cater for your child's needs

• your child's photographs and videos during our classes for our training and promotional material or when you submit them for our competitions

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. These are outlined below:

• when you book a class we receive your payment details from our third party booking service provider

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

* To fulfil a contract, or take steps linked to a contract: this is relevant where you make a purchase from us or enter a competition we run. This includes:
* communicating with you
* verifying your identity
* taking payments
* reserving a space for you in our classes when you book a class with us or attend your private parties
* As required by us to conduct our business and pursue our legitimate interests, in particular:
* to provide products and services you have requested such as your private party requests, and respond to any comments or complaints you may send us
* if you provide a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number and card number you submit to prevent fraud (see data sharing below)
* we will use data in connection with legal claims, compliance, and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation
* Where you give us consent:
* we will send you direct marketing in relation to our relevant products and services, or other products and services provided by us, our affiliates and carefully selected partners
* we will process your or your child's allergy information, to provide you with an allergy free environment where we can and when you inform us
* on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time
* For purposes which are required by law:
* In response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests.

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by contacting us using the details set out below.

Who will we share this data with, where and when?

• Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws;

• Personal data will also be shared with third party service providers, who will process it on behalf of us for the purposes identified above. In particular, we use third party providers of booking and payment processing services ; and

• In the event that our business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser’s adviser and will be passed to the new franchisees.

What rights do I have?

You have the right to ask us for a copy of your personal data held by us; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to either party for a contract or with your consent in a structured, machine readable format, and to ask either entity to share (port) the personal data they hold about you to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don’t have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in the GDPR. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to complain to an EU data protection authority where you live, work or where you believe a breach may have occurred.

For booking a class the provision of your card data is mandatory: if relevant data is not provided, then we will not be able to enrol you on a class or when you purchase a sibling kit from us we will need your payment information and address otherwise we will not be able to send you the product.

All other provision of your information is optional. For example if you do not inform us about your child's allergies or disabilities, we may not be able to ensure that the class you attend will be free from such allergens or special arrangements will be provided to meet your child's needs.

How do I get in touch with you?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch with us at:

• danielle@createmate.co.uk

How long will you retain my data?

• Where we process registration data, we do this for as long as you are an active attendee of our classes and for 2 years after this.

• Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

• Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.