**PRIVACY POLICY**

**This is the privacy policy of Living Classrooms CIC.**

We respect your privacy and are determined to protect your personal data. The purpose of this privacy policy is to inform you as to how we look after your personal data when you visit our booking website (regardless of where you visit it from). We’ll also tell you about your privacy rights and how the data protection law protects you.

**1. Who we are and important information**

**What is the purpose of this privacy policy?**

This privacy policy aims to give you information on how we collect and process your personal data through your use of this booking website.

You must read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them.

**Data controllers**

Living Classrooms CIC is the controller and responsible for your personal data (collectively referred to as “Living Classrooms CIC”, "we", "us" or "our" in this privacy policy). Our contact details are:

Registered office:

The Old School

Fowlis Wester

Crieff

PH7 3NL

info@naturepedagogy.com

+44 (0) 1764 650030

For all data matters contact our Data Protection Officer at info@naturepedagogy.com

**Third-party links outside of our control**

This booking website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave this booking website, we encourage you to read the privacy policy of every website you visit.

**2. The personal data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows.

**Identity Data**

includes title, first name, last name

**Contact Data**

includes billing address, delivery address, email address, telephone numbers

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have ordered but we will notify you if this is the case at the time.

**3. How we collect your personal data**

We use different methods to collect data from and about you including:

Directly

You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

Request marketing information be sent to you;

Make an enquiry.

**4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

**Legitimate Interest**

This means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us on info@naturepedagogy.com

**Consent**

When you have given clear consent for us to process your personal data for a specific purpose such as processing your application for membership or sending you direct marketing communications to you via email. You have the right to withdraw consent to our communications by contacting us on info@naturepedagogy.com.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on info@naturepedagogy.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To answer your query | (a) Identity(b) Contact | Legitimate interest |
| To supply you with the products you have bought in our online shop | (a) Identity(b) Contact(c) Financial | Performance of contract |
| To book you a place on our training courses or webinars | (a) Identity(b) Contact(c) Financial | Performance of contract |
| To send you newsletters | (a) Identity(b) Contact | Consent |
| To send you marketing information | (a) Identity(b) Contact | Consent |

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have established the following personal data control mechanisms:

**Promotional marketing**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

**Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us on info@naturepedagogy.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase.

**Cookies**

A cookie is simply a technology for remembering something about you, in the form of small pieces of data that we store in your web browser. Every time you visit our website our cookies are sent to us, letting us recognise you as the same person that had visited previously.

This helps us give you a good experience, and provides us with data we can look at to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

We use the following categories of cookies:

**Strictly necessary cookies**

These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies**

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies**

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Some third-party services will also set cookies, including:

**Website Analytics**

We use Google Analytics to measure visitors to our website. You can read Google's explanation of how they use your data here.

**Business Services**

Currently, our payment processor is Stripe. Stripe uses and processes your complete payment information in accordance with their privacy policy.

**Social media embeds**

We may include certain social media widgets on our website, like YouTube videos and Facebook feeds. To do so we embed code that they provide and we do not control ourselves. To function, their widgets generally know if you're logged in; for example Facebook uses this to say "x of your friends like this".

We do not have any access to that information, nor can we control how those networks use it.

**Change of purpose**

We will only use your personal data for the purposes for 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email info@naturepedagogy.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**5. Who we share your personal data with**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties such as Claire Warden Ltd and Mindstretchers Ltd.

External Third Party Services

Providers acting as processors based in the United Kingdom, the EEU and USA who provide IT and system administration services such as these are Tito, Administrate, DPD, Dropbox, Eventbrite, imatrix, Mailchimp, Surveymonkey, Paypal, Stripe, Web Smart Media and Xero.

Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**6. International transfers**

To deliver products and services to you, it is sometimes necessary for us to share your data outside of the European Economic Area (EEA). This will typically occur when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws. If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice is to use ‘standard data protection clauses’ which have been approved by the European Commission for such transfers. Those clauses can be accessed here.

Please contact us on info@naturepedagogy.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

**7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**8. Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**9. Your legal rights**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

The right to request a copy of the personal data which we hold about you;

The right to request that we correct any personal data if it is found to be inaccurate or out of date;

The right to request your personal data is erased where it is no longer necessary to retain such data;

The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;

The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);

The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;

The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact info@naturepedagogy.com.

No fee required - with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**10. Changes to this policy and your duty to inform us of changes**

This version was last updated on 30 July 2019 and historic versions can be obtained by contacting our Data Protection Officer on info@naturepedagogy.com.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

**11. Queries, requests or concerns**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer on info@naturepedagogy.com.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office. You can do so via phone on 03031 231113, email or by post to:

The Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

England

UK