

Purpose of this privacy notice

It is important that you read this privacy notice. It aims to provide you with information on how Kihonkai Karate Academy collects and processes the personal data you provide when signing up with us, including any data you provide via a paper agreement, through the electronic portal, or any additional data you provide via our online enquiry forms and e-mail. This agreement is not intended for children. A parent or guardian will be required to sign on behalf of anyone under the age of 18 to whom the relevant data pertains to. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact Kihonkai Karate
0141 250 7561
or mob: 07950 195616
email: lanarkshirekarate@live.co.uk

Collected Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data anonymous data. We may collect, use, store and transfer different kinds of personal data about you:

Identity Data includes data which you provide to us such as first name, last name, title, date of birth and gender.

Contact Data includes postal address, email address and telephone numbers .

Student Information where that student is a person under 18 that you are responsible for or if over 18 the person who you have agreed to make the payments for their tuition.

We also collect and use 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. 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 notice.

Where we need 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. In this case, we may have to cancel a service you have with us but will notify you if this is the case at the time.

Collection of Data

We use different methods to collect data from and about you including through direct interactions. You may give us your data by filling in a payment agreement form containing a Direct Debit authority or by completing an electronic agreement containing a E-Direct Debit or by corresponding with us by post, phone or email to update your information.

Use of Personal Data

We only use your personal data when the law allows us to. Outlined below are the intended uses of your data, the legal bases we rely on, and our interests where appropriate. Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.

To register you as a new Payer/Student and to activate your payment method.	Identity Contact Student details Bank Details	Performance of a contract with you and to comply with our legal and regulatory body obligations.
To process, manage and deliver: (a) your payment collections. (b) your payment history (c) any unpaid collections. (d) the contract requirements should you decide to cancel your agreement. (e) reactivate your payment method if you have cancelled with your bank in error and request this.	Identity Contact Financial Transaction Marketing & Communications	Performance of a contract with you Legitimate interest to recover any debts owed to us
To update our Client management system with any details you have changed or details of students you have added or removed.	Identity Contact Student details	Legitimate interests to keep all records updated.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	Identity Contact Profile Marketing & Communications	Performance of a contract with you. Necessary to comply with a legal obligation. Legitimate interests (to keep our records updated and to study how Clients use our products/services).
To enable you to use any data update systems	Identity Contact Profile Usage Marketing & Communications	Performance of a contract with you. Legitimate interests (to study how customers use our products/services, to develop them and grow our business and to enable you to update your data and preferences).
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business

		reorganisation or group restructuring exercise). Legal obligation.
To deliver relevant website content to you and measure or understand the effectiveness of any notices that we provide to you.	Identity Contact Profile Usage Marketing & Communications Technical	Legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Identity Usage	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

We will use your data to complete our obligations under the agreement that we have with you to collect your payments for tuition and any additional services provided as recorded on the agreement or for those as subsequently amended by you from time to time and as described in the table above. We may also add data to the students records on the system for example: attendance, attainment level (grade), membership records and communications.

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 contact us. 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.

Disclosure of Data

We may have to share your personal data with those set out below for the purposes set out above:

External Third Parties

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 notice.

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.

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.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us. In some circumstances you can ask us to delete your data. 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.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below for information on these rights:

Request access to your personal data (commonly known as a “data subject access request”):

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of your personal data:

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you become aware that we hold incorrect information please contact us and we will make the correction, for example: address changes and contact details changes such as address, telephone number or e-mail details. Changes to Bank Details in relation to Direct Debit payments are normally notified direct to us by your bank if you change bank using the bank transfer system, and you do not have to take further action. But if you do not use that process please contact us with the new bank details and we will make the appropriate arrangements for you to continue payments without interruption.

Request erasure of your personal data:

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data:

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing your personal data:

This enables you to ask us to suspend the processing of your personal data in the following

scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

In most cases we hold your personal data based on an agreement that you have made with us which provides a lawful basis to retain the data and process it in accordance with that agreement. But if you have any concerns at all please contact us.

Right to withdraw consent:

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we will not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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. Alternatively, we may refuse to comply with your request in these circumstances. 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.

If you wish to exercise any of the rights set out above, please contact us.