

Data Protection and Privacy Policy

- 1. Scramble Academy's data protection and privacy policy has been informed by the Data Protection Act 2018 and GDPR compliance.
- 2. We will only ask you for information that is absolutely vital to the registration process in managing our Member base and payment system efficiently and nothing more. This is limited to email, name, phone, address, emergency contact name, emergency contact phone number and credit/debit card details for payment. Our only purpose in this is being able to invoice and charge our Members, contact our Members regarding goings on at the Academy and any potential issues with Membership and payment, as well as emergency contact and identifying information in the interest of Member safety in the event of emergency.
- 3. Scramble Academy will not collect any log file information, including IP addresses, nor monitor how long users spend on the site and which pages they visit. You can visit the site without identifying yourself or providing any personal information not voluntarily offered as part of a Membership sign up.
- 4. We will not transfer any of your data to third parties.
- 5. The webserver that hosts this site is not used to store personal information of any kind.
- 6. Any and all personal information that you provide as part of the registration process is stored on our Go Cardless or Stripe database within their encrypted PCI service provider level 1 certified servers. This is the most stringent level of certification available in the payments industry.
- 7. Once your card information is entered and stored on the Go Cardless or Stripe database then no one on the Scramble Academy team will have access to it, and will only be able to levy Membership fees or other charges against it with your consent.
- 8. Responsibility for the implementation of this policy is shared across all staff of Scramble Academy Limited.
- 9. Scramble Academy will adhere to the six data protection principles set out under general data protection regulation by methods detailed in this policy. These are that personal data should be:
 - 1. Processed fairly and lawfully and in a transparent manner.
 - 2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

- 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 4. Accurate and kept up to date.
- 5. Kept only for as long as is necessary for those purposes.
- 6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 10. Under the General Data Protection Regulation, an individual has the following rights:
 - 1. To be informed about how their personal data is being used.
 - 2. To access the personal data held about them.
 - 3. To request that elements of that data be ported to another service provider.
 - 4. To request rectification of any mistakes in the data that is held.
 - 5. To request the erasure of personal data in certain situations.
 - 6. To request the restriction of processing.
 - 7. To object to the processing.
 - 8. To object to any decisions being taken by automated means.
- 11. A request to exercise any of these rights can be made free of charge and at any time via Email (info@scrambleacademyleeds.com), Facebook Message, or in Person at Scramble Academy to any of the Members of Staff.
- 12. All Members are responsible for checking that any personal data that they provide to Scramble Academy is accurate and up to date and informing Scramble Academy of any changes to that information, e.g. change of address, email etc.
- 13. This privacy policy may not apply if we are required to disclose information by a court of law or other relevant body.

This document was last updated on 29/06/2021