

# PRIVACY NOTICE

Last updated April 2022

This privacy notice is for Go Create (“Company”, “we”, “us”, or “our”, describes how and why we might collect, store, use and/or “process” your information when you use our services (“Services”), such as when you:

- Visit our website <http://www.gocreate.co.uk>, or via our social media platforms
- Engage with us in other ways, including any sales, marketing or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [info@gocreate.co.uk](mailto:info@gocreate.co.uk)

## SUMMARY OF KEY POINTS

**This summary provides key points from our privacy notice but you can find out more details about any of these topics further within this document.**

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Go Create and the Services, the choices you make and the products and features you use.

### **Do we process any sensitive personal information.**

We may ask basic medical questions when booking onto a course to support with the provision of our service and to maximise safety.

**Do you receive any information from third parties?** We do not receive any information from third parties.

**How do you process information?** We process your information to provide, improve and administer our Services, communicate with you, for security and fraud prevention and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

### **In what situations and with which parties do we share personal information?**

We may share information in specific situations and with specific third parties.

### **How do we keep you information safe?**

We have organisational and technical processes and procedures in place to protect your personal information. However no electronic transition over the internet or information storage technology can be guaranteed to be 100%

secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify your information

### **What are your rights?**

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

### **How do I exercise my rights?**

The easiest way to exercise your rights is by contacting us at [info@gocreate.co.uk](mailto:info@gocreate.co.uk). We will consider and act upon any request in accordance with applicable data protection laws.

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### **1. WHAT INFORMATION DO WE COLLECT?**

In short, we collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products or Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect may include the following:

**Names**

**Phone numbers**

**Email addresses**

**Postal address**

**Username**s

**Password**s

**Contact Preferences**

**Contact or Authentication data**

**Billing addresses**

## Payment Data

Please note that we use Paypal to process payments if you make purchases. All payment data is stored by Paypal. We receive a summary of the transaction from PayPal which is needed for statutory accounting and tax records which will only include details such as your name and address, the date of the transaction, product description and amount paid. You can find paypal's privacy notice at

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

All personal information that you provide to us must be true, complete and accurate and you must notify us of any changes to such personal information.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

In short: We process your information to provide, improve and administer our Services, communicate with you, for security and fraud prevention and to comply with the law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

**To facilitate account creation and the authentication and otherwise manage user accounts.** We may also process your information so you can create and log in to your account as well as keep your account in working order.

**To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.

**To respond to user enquiries/offer support to users.** We may process your information to provide you with the requested service.

**To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies and other similar information.

To fulfil and manage your orders. We may process your information to fulfil and manage your orders, payments, returns and exchanges made through the Services.

To enable user-to-user communications. We may process your information if you choose to use any of our offerings that allow for communication with another user.

To request feedback. We may process your information when necessary to request feedback and to contact you about your use of Services.

**To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes. If this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.

**To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location and more.

**To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

**To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.

**To determine the effectiveness of our marketing and promotional campaigns.** We may process your personal information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

**To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

### **3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?**

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (ie legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

**Consent.** We may process your information if you have given us permission (ie, consent) to use your personal information for a specific purpose. You can withdraw your consent at any time by contacting [info@gocreate.co.uk](mailto:info@gocreate.co.uk) or unsubscribing.

**Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

#### **Legitimate Interests.**

We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described below:

- Send users information about special offers and discounts on products and services

- Develop and display personalised and relevant advertising content for our users
- Analyse how our services are used so we can improve them to engage and retain users
- Support our marketing activities
- Diagnose problems and/or prevent fraudulent activities
- Understand how our users use our products and services so we can improve user experience

### **Legal obligations**

We may process your information where we believe it is necessary for compliance with our legal obligations, such as to co-operate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

### **Vital Interests**

We may process your information where we believe it is necessary to protect your vital interests or vital interests of a third party, such as situations involving potential threats to the safety of any person.

## **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION**

In short: We may share information in specific situations described in this section and or with the following third parties.

We may need to share your personal information in the following situation:

Other Users:

When you share personal information (for example by posting comments, contributions, or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside of the Services in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services and view your profile.

## **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

In short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the time in which users have an account with us.

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize such information, or if this is not possible (for example, because your personal information has been stored in back-up archives), then we will securely store your personal information and isolate it from further processing until deletion is possible.

## 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In short, We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission or personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 7. DO WE COLLECT INFORMATION FROM MINORS?

In order to enrol your child onto our courses requires you to provide personal information about you and your child.

We collect this information to help run courses properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your child is allergic to something or might need extra help with some tasks.
- We may use venues that use CCTV to make sure the site is safe. CCTV would not be used in private areas such as changing rooms.
- We may need to report some of your child's information to the government. For example, we may need to tell the local authority that your child attends a club or camp or to let them know if we have any concerns about your child's welfare.
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other children.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if a fellow child is injured or if there is a burglary.
- If your child has misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by police.

Subject to your consent (via booking forms) we may use photographs or videos of your child for the Go Create website and social media sites or in literature to show prospective students what we do here and to advertise courses. We may continue to use these photographs and videos after your child has left the course.

- If you have any concerns about us using photographs or videos of your child please email [info@gocreate.co.uk](mailto:info@gocreate.co.uk) and indicate on the booking form.
- We may publish news on the website to tell people about what we have been doing.

If you have any concerns about the above, please email [info@gocreate.co.uk](mailto:info@gocreate.co.uk)

## 8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in this section “How can you contact us about this notice?” below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority.

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at time by emailing [info@gocreate.co.uk](mailto:info@gocreate.co.uk) or by collecting unsubscribe, or updating your preferences.

However, please note that this will not affect the lawfulness of the processing of your personal information conducted in the reliance of lawful processing grounds other than consent.

**Option out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send,. You will then be removed from marketing lists. However, we may still communicate with you. For example, to send you service related messages that are necessary for the administration and use of your account, to respond to service requests or for other non-marketing purposes.

### **Account information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account

Upon your request to terminate your account, we will deactivate or delete your account information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have any questions or comments about your privacy rights you can email us at [info@gocreate.co.uk](mailto:info@gocreate.co.uk)

## 9. CONTROLS FOR DO-NOT -RACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10. DO WE MAKE UPDATES TO THIS NOTICE

In short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have any queries or comments about this notice, you may contact our Data Protection Officer, Kirsty Kennedy Stenlake, by email at [info@gocreate.co.uk](mailto:info@gocreate.co.uk), by phone on 0208 1665 134 or by post to

Go Create  
170 High Street  
Margate  
Kent  
CT91LA

## 12. HOW CAN WE REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to personal information we collect from you, change that information or delete it in some circumstances. To request to review, update, or delete your personal information, please check your preferences, click unsubscribe on mailings or email [info@gocreate.co.uk](mailto:info@gocreate.co.uk).

This policy was created on 11<sup>th</sup> April 2022