



Data, Privacy & GDPR Policy

1. Who we are

Little Musketeers Ltd., (Registered Company **06791435**, ICO Register of Data Controllers Number **ZB056273**) and its franchisees/subsidiaries, is a sports education company educating and promoting the healthy and active lifestyles of children in schools and activity clubs throughout the UK. We deliver PE and sports programmes inspired by the Olympic sport of fencing.

2. Our commitment to user privacy and data protection

“Little Musketeers”, also referred to as “we”, “us”, “our” in this Privacy Policy) is committed to meeting the highest standards of data protection to provide the best service to our contacts. We will tell our contacts exactly how we will use and store their data; not use it for any purpose other than the ones for which we have a lawful basis; and use appropriate security measures in relation to the data. Little Musketeers is committed to respecting the personal data you supply us with. The details we store enable us to personalise the service we provide and, with your express consent, to keep you updated with details of courses, camps and services that may be of interest to you. With your consent, we may contact you by post, telephone or email and share this information with pre-agreed third parties to provide information to you about other services and products that we think might be of interest to you. If we want to use the data in this way then we will ask for your consent each time. You have the right to opt out of receiving promotions from us and/or our chosen third parties at any time. This can be done by emailing us at enquiries@littlemusketeers.com. If you think any information we hold about you is incorrect you should notify the Data Protection Officer at enquiries@littlemusketeers.com. | Any information which is incorrect will be corrected within a month.

3. Relevant legislation

We process all personal data, including that collected via this website in accordance with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA). GDPR/DPA outline how organisations must collect, handle and store personal information. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any unauthorised parties.

Users who entrust their personal data to companies like Little Musketeers have the following rights under GDPR:- The right to be forgotten (you can request for your data to be deleted)

– The right to see all the data we hold on you (by submitting a Subject Access

Request)

- The right to data portability (if you ask for a copy of all of your data, we'll give it to you in a commonly used format, like a pdf)
- The right to correct inaccurate information we hold on you
- The right to opt-out of marketing communications as easily as you opted in
- The right to restrict or object to processing (although we may still need to hold on to your data, for example to fulfil a contract)
- The right to complain (this would be to a supervisory authority responsible for data protection. In the UK, this is the Information Commissioner's Office)

4. **Personal information that this website collects and why we collect it**

4.1 Site visitation tracking. When visiting musketeerseducation.com, you will be asked to consent to our use of cookies. Cookies are simple text files that a site saves to your computer or mobile device using your website browser. Only the server of that site will be able to retrieve or read the contents of that cookie and each cookie is unique to your web browser. Cookies are either set by the website you are visiting, in which case they are referred to as 'first-party cookies' or are 'third-party cookies' set by other websites and services that run content on the page you are viewing. See our cookie policy for more information. As with most websites, we use Google Analytics to measure how visitors move through and engage with the website. We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. To opt out of google analytics please click here: <https://tools.google.com/dlpage/gaoptout> Google Analytics records information such as your location, and the device, browser and operating system you are using to view the website ("**usage data**"). None of this information can be used to identify you. Google Analytics records – but does not grant us access – to your computer's IP address. For this reason, we treat Google as a third-party data processor (see section 7.0 for more information). We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. The legal basis for this processing is our legitimate interests.

Disabling cookies on your internet browser will stop Google Analytics from tracking any aspect of your journey through our website.

To read our full cookie policy, please visit littlemusketeers.com

4.2 Contact forms and email links

You may provide personal data to us via the forms on our Login/Registration portal. This data is used to perform each contract that we have with you (and to take steps at your request to enter into such contracts). It is securely held and stored solely for us on Amazon AWS, which is amongst the most secure servers in the world. Please visit aws.amazon.com/privacy/ for more information

You will only ever receive correspondence from us directly or via a sender authorised by Little Musketeers, based on the notification settings in your account.

4.3 Additional communications

Where you give consent, we may contact you with additional communications around specific promotions.

Please note that you will need to email us using the email account you want to have removed from our records.

4.4 Parental Data (once you are a Little Musketeers customer)

What information we will hold on you

When you sign your child up for a Little Musketeers course, we collect the following information from you: name, relation to child, email address, phone number, home address, and payment details.

How we will use it

We use this information for billing purposes, and to perform our contractual obligations for example sending you information relating to your booking (e.g. if your child needs to bring a certain item of clothing, or if there has been a change of timing or location).

How long we'll keep your data

We delete your data from our system if you no longer fulfil our sales criteria – i.e. if you have not made a purchase from us for the past two years, have not opened the last 11 of our emails, or if the children you are booking courses for are now older than the age range we deliver to (4-12 years old).

We do retain your email address on a 'Unsubscribe' list, to ensure we do not contact you again once you have asked to be removed from our email lists.

We may periodically contact you to check that your communication preferences are up to date

4.5 Children's Data

What information we will hold on your child

When you sign your child up for a Little Musketeers course, we collect the following personal data of your child: name, DOB, gender, school, a record of their performance in Musketeers Education courses and medical information. During Little Musketeers courses, we will also need to record attendance.

How we will use it

We use this information to perform our contractual obligations and for monitoring and reporting purposes. Monitoring is undertaken using anonymised data. This means we can see how many children we have activated, in which regions, and what the overall impact on their attainment and health has been.

Our justification for holding this data

We ask for your consent when you sign your child up to a Musketeers Education course to hold their name, DOB, gender, grade and a record of their performance on Little Musketeers courses and also their medical conditions.

We also have a contractual need to hold some of this information. We keep a record of attendance and medical information under the 'vital interest' justification, to safeguard your child and comply with our legal obligations.

How long we'll keep your data

We will retain a child's data whilst he or she is attending a course and whilst you are a Little Musketeers customer (see above section).

4.6 School's data

What information we will hold on schools

We hold email addresses of teachers and headteachers (both named and generic addresses).

In some cases, we hold an anonymised record of pupils' attainment against National Curriculum standards on Little Musketeers programmes for monitoring and reporting purposes. This means we can see how many children we have reached, in which areas, and what the overall impact on their attainment and health has been.

How we will use it

We hold contact information (email addresses, postal addresses and phone numbers) for billing purposes.

We also retain email addresses in order to contact schools with marketing information which we think will be of interest to them.

We have a contractual need to hold records of pupils' attainment against National Curriculum standards and to provide this to schools for reporting purposes.

How long we'll keep your data

We have the right to retain data which is in the public domain, including school names, addresses, phone numbers and generic email addresses.

We will retain pupil data for the lifetime of the school's contract with us. If a school ends their contract with us, we will delete all pupil data for that school within three months of the end of the current academic year.

5. How we store your personal information

5.1 Where your data is stored

If you create an account through our website, your information is securely stored in our server hosted in the US with Amazon AWS.

aws.amazon.com/privacy/

5.2 Sharing or transferring your data

We will only share parents' and children's information with those parties who may need to see it, for example members of staff. We will also share data with one of our franchisees if that franchisee is responsible for running your child's course. We may pass your information on to our third-party service providers, agents or subcontractors for the purposes of completing a task or providing services to you on our behalf. However, we disclose only the personal information necessary to deliver that service and have a contract in place that

requires them to keep your information secure and not to use it for their own marketing purposes. Third party services providers who act as data processors on our behalf: STRIPE

These organisations will be selected in part due to their commitment to data security. All will be GDPR-compliant as outlined in Section 2. Those based in the USA are also EU-US Privacy Shield compliant. When we transfer data as part of this sharing, we will securely encrypt it before transferring.

Where we use data processors outside the European Economic Area we will only use those who can guarantee the safety of your information and who commit to the terms required by GDPR/DPA. You consent to us transferring your personal data outside the EEA to these data processors.

6. Data Breaches

In the event of an unlawful data breach of this website or any of our data held on third-party data processors, we will inform the Information Commissioner's Officer within 72 hours of the breach, if the rights and freedoms of those individuals whose data has been compromised is at risk. We will inform those individuals of the breach if the data compromised could have a significant negative impact on the individuals concerned (e.g. if it affects their financial or medical data).

7. Data Controller

The data controller of this website is Little Musketeers Ltd., company number **06791435** Registered address and operating office:

15 Madeira Avenue
Leigh on Sea
Essex
SS9 3EA

8. Data Protection

Our contact information for data protection is:

enquiries@littlemusketeers.com

9. Information Commissioner's Office (ICO)

If you need to contact the ICO to report any issues with the way we have handled your personal data, you contact them through the following channels: Call the helpline: 0303 123 1113 Visit their website: <https://ico.org.uk/> Start a live chat with them: <https://ico.org.uk/global/contact-us/live-chat/>

10. What will happen to your data in the event of an acquisition

In the event of a takeover or acquisition, the personal data we hold will form part of the assets of the organisation and be taken over by the new company, but only used for the same or similar purpose. In these circumstances, we will write to everyone we hold data on and notify them about the change of ownership.

11. Changes to our Privacy Policy

We will continue to review and update this policy in line with the latest industry guidance. This version was last updated in May 2021. Historic versions can be obtained by contacting us.