

Choreographytogo Ltd

GDPR Data Protection Policy

Last updated: 25 November 2025

Approved by: Rachel Holmes, Director

1. Policy Statement

Choreographytogo Ltd is committed to protecting the privacy, confidentiality, and security of all personal data we hold.

We comply with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and all relevant ICO guidance.

We collect and process personal data only for legitimate business purposes, and we ensure that all learners, clients, tutors, and staff understand how their data is used, stored, and protected.

2. Purpose of This Policy

This policy explains:

- What personal data we collect
 - How and why we process it
 - How we store, secure, and retain it
 - Your rights under UK GDPR
 - How to contact us regarding data protection
-

3. Scope

This policy applies to:

- All staff, tutors, assessors, contractors, and volunteers working for Choreographytogo Ltd
 - All learners, customers, and course participants
 - All data processed through our websites, course dashboards, online sessions (Zoom), email, WhatsApp groups, CRM systems, and payment platforms
-

4. What Personal Data We Collect

We may collect the following types of data:

Personal Identification Data

- Name
- Address
- Email
- Telephone number
- Date of birth (where required for qualification registration)

Health & Medical Information (where appropriate)

- PAR-Q responses
- Medical conditions relevant to physical activity
- Emergency contact details
This data is only collected when necessary to ensure safety and compliance for physical activity sessions or assessments.

Payment and Transaction Data

- Billing address
- Payment history
(Note: Payment card details are processed securely by third-party payment processors such as Stripe or PayPal. We do not store card data.)

Learner & Course Information

- Qualification registration details
- Assessments, coursework, and feedback
- Attendance records
- Certification data
- Communications relating to learning support

Digital Information

- IP addresses
 - Cookies (via our website)
 - Login information for dashboards
 - Zoom attendance logs
-

5. Lawful Basis for Processing

We process data under the following lawful bases:

- **Contract** – To provide courses, training, memberships, and services.
- **Legal obligation** – To register learners with awarding bodies and maintain mandatory records.
- **Legitimate interest** – For business operations, marketing to existing customers, improving services.

- **Consent** – For optional marketing emails, newsletters, or photography/video consent.
 - **Vital interests** – In emergency situations involving health or safety.
-

6. How We Use Personal Data

Personal data may be used to:

- Process course registrations and bookings
 - Deliver training, qualifications, classes, and digital content
 - Provide learner support and feedback
 - Register learners with awarding bodies (Active IQ, YMCA Awards, YAward, EMD UK)
 - Issue certificates and maintain qualification records
 - Communicate important updates, course changes, or safety information
 - Provide customer service
 - Improve our website and services
 - Send newsletters or marketing emails (only where consent has been given)
-

7. Sharing Personal Data

We *only* share data when necessary and with trusted partners, including:

- Awarding organisations (Active IQ, YMCA Awards, YAward)
- Payment processors (Stripe, PayPal)
- Email marketing platforms - Mailerlite
- Our membership/digital content platforms
- IT and website support providers

- Legal or regulatory bodies (if required)

We never sell or rent personal data.

8. Data Storage & Security

We take data security seriously and use appropriate measures, including:

- Password-protected systems
- 2FA on accounts where available
- Encrypted devices
- Secure hosting and payment gateways
- Restricted access to sensitive information

Health and PAR-Q data is stored securely and only accessed by instructors who require it for safety and duty of care.

9. Data Retention

We retain data only for as long as necessary:

Type of Data	Retention Period
Learner records for qualifications	Minimum 3 years (industry standard)
PAR-Q & health data	7 years (for insurance and legal purposes)
Financial records	6 years (HMRC requirement)
Email marketing data	Until the user unsubscribes
General enquiries	Up to 12 months

When data is no longer required, it is securely deleted or anonymised.

10. Rights of Data Subjects

Under UK GDPR, individuals have the right to:

- Access their data
- Rectify inaccurate data
- Request deletion (“right to be forgotten”)
- Restrict processing
- Object to processing
- Withdraw consent at any time (for marketing)
- Data portability

Requests will be responded to within **one month**.

To exercise these rights, contact:

 Rachel@choreographytogo.com

11. Data Breach Procedure

In the event of a data breach:

1. It will be identified and contained immediately.
 2. Assessment of risk to individuals will be carried out.
 3. If required, the ICO will be notified within 72 hours.
 4. Individuals affected will be informed without undue delay.
 5. A review will be carried out to prevent recurrence.
-

12. Cookies

Our websites use cookies to:

- Improve user experience
- Analyse web traffic
- Enable essential website functions

Users can manage or disable cookies via their browser settings. Full details are available in our Cookie Policy.

13. Marketing Communications

We only send marketing emails where:

- You have explicitly opted in, or
- You are an existing customer with a legitimate interest basis

You may unsubscribe at any time via the link in each email.

14. Children's Data

We do not knowingly collect data from individuals under 16 without parental or guardian consent.

15. Contact Details

For any questions about this policy or your personal data:

Data Protection Officer / Director:

Rachel Holmes

 Rachel@choreographytogo.com

 351 Cromford Road

Langley Mill, Nottingham NG16 4HA, UK

16. Review of Policy

This policy will be reviewed **annually**, or sooner if legislation changes.

25 November 2025

Rachel Holmes Director

A handwritten signature in black ink, appearing to read 'R Holmes', with a horizontal line underneath the signature.