

NEST MANAGEMENT LTD

EVENTS BOOKING PRIVACY NOTICE



NEST

Date	29/01/2019
Title	Events Booking Privacy Policy
Author	NEST & Actons
Owning Department	Executive
Version	Issue 1.0
Approval Date	29/01/2019
Review Date	Annual
Approved by	NEST Management Team

NEST MANAGEMENT LTD

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VERSION RECORD			
Version	Date	Status	Comment
0.1	29/01/2019	Draft	To management team for approval
1.0	29/01/2019	Live	

Welcome to NEST Management Ltd (Events Booking) - Privacy Notice

Through this website Nest Management Limited (**We**)we provide event booking services in relation to events organised by other organisations including schools, clubs, associations, national governing bodies and franchise businesses engaged in, but not limited to, Martial Arts and Dance.

This notice contains the following sections, please click on each one to navigate through the document or scroll through them. Also, please note that the Glossary will help you to understand the meaning of some of the terms used in this privacy notice:

1. **[Important information and who we are](#)**
2. **[The data we collect about you](#)**
3. **[Special Category Data](#)**
4. **[If you fail to provide data to us](#)**
5. **[How is your personal data collected](#)**
6. **[How we use your personal data](#)**
7. **[Disclosures of your personal data](#)**
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1. Important information and who we are

Purpose of this privacy notice

It is important that you read this privacy notice. It aims to give you information on how NEST Management Limited collects and processes your personal data when you use this site to book an event. Please note, neither this website nor our services are intended for children.

Controller

NEST is the controller and responsible for your personal data. We have appointed a responsible officer for data privacy who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the officer responsible for data privacy using the details set out below.

Contact details

Our details are: NEST Management Limited

Data Protection Manager

Email address: datamanagement@nestmanagement.co.uk

Postal address: Unit 3.2/3.3 Wilford Business Park, Ruddington Lane, Nottingham, NG11 7EP

Telephone number: +44 (0) 115 945 5030

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

It is important that the personal data we hold about you or your child is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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We may collect, use, store and transfer different kinds of personal data about you or your child which we have grouped together follows:

- Identity Data includes data which you provide via our enquiry form agreement, such as first name, last name, marital status, title, date of birth and gender.
- Contact Data includes billing address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments and details events you have registered to attend or have previously attended.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage includes information about how you use our website and services.

Where it is intended that a child is to be the registered attendee at any event, all information provided by you in respect of such child is provided with your explicit consent. Such consent may be withdrawn by you at any time by notice in writing to us, and in the event you give such notice to us we will cease to process that data as soon as reasonably practical.

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.

3. If you fail to provide personal data to us

If you fail to provide personal data when required we will not be able to process an event booking for you.

4. How is your personal data collected

We use different methods to collect data from and about you or your child including through direct interactions. You may give us your data (or that of your child) by filling in a form or by corresponding with us by post, phone or email. This includes personal data you provide when you:

- Book to attend (whether personally or on behalf of your child) any event(s);
- Make payment for your (or your child's) attendance at any event(s) for which a fee is payable;
- Give us some feedback;
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

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- Third parties. We may receive personal data about you from various third parties as set out below;
- Technical Data from the following parties including analytics providers such as Google Analytics, and advertising networks such as Google AdWords and Facebook.

5. How we use your personal data

We only use your personal data (or that of your child) when the law allows us to.

We have set out below, in a table format, a description of all the ways we plan to use your personal data (or that of your child), and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process your booking for any event (whether personally or on behalf of your child) which may include collecting or facilitating the collection of payments	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract (b) Necessary for our legitimate interests (to process your booking) (c) Consent
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to keep our records updated and to study how Interested Parties use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services and customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant and to develop our business)

Purposes for which we will use your personal data

As described in the table above, but please note that we may process your personal data (or that of your child) for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data (or that of your child) where more than one ground has been set out in the table below.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

Change of purpose

We will only use your personal data (or that of your child) 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 (or that of your child) 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 (or that of your child) without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We will not use your contact details for any marketing activities and we do not sell your contact details (or those of your child) to third parties. We will only contact you regarding an existing booking or booking attempt.

As we are acting on behalf of the event organiser, we will forward your contact details (or those of your child) and booking information to the event organiser of your selected event. The event organiser is responsible for their own compliance with GDPR and will have their own privacy policy. You agree that we are not responsible for the actions of the event organiser with regard to your personal data or that of your child.

We may have to share your personal data (or that of your child) with those set out below for the purposes set out above.

- To third parties such as professional advisors including lawyers, bankers, auditors, insurers, merchant service providers and email/text service providers who may provide consultancy, banking, legal, insurance, accounting services and otherwise assist NEST with processing your booking.
- 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 (or that of your child) in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data (or that of your child) and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data (or that of your child) for their own purposes and only permit them to process your personal data (or that of your child) for specified purposes and in accordance with our instructions.

7. International transfers

We do not transfer your personal data (and/or that of your child) outside the European Economic Area (EEA).

8. Data security

We have put in place appropriate security measures to prevent your personal data (and/or that of your child) from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data (and/or that of your child) to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data (and/or that of your child) on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data (or that of your child) 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 (or that of your child), the purposes for which we process your personal data (or that of your child) 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 (or that of your child) are available in our Retention Policy which you can request by contacting us.

In some circumstances you can ask us to delete your data (or that of your child).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you or your child) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data (or that of your child). Please see below to find out more about these rights:

- **Request access to your personal data:**
Request access to your personal data (or that of your child) (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you or your child and to check that we are lawfully processing it.

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- **Request correction of your personal data:**

This enables you to have any incomplete or inaccurate data we hold about you or your child 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.

- **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 (or that of your child) where you have successfully exercised your right to object to processing, where we may have processed your information (or that of your child) unlawfully or where we are required to erase your personal data (or that of your child) 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 or those of your child. You also have the right to object where we are processing your personal data (or that of your child) for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information (or that of your child) which override your rights and freedoms (or those of your child).

- **Request restriction of processing your personal data:**

Request restriction of processing of your personal data (or that of your child). This enables you to ask us to suspend the processing of your personal data (or that of your child) 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 (or that of your child) but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data:**

Request the transfer of your personal data (or that of your child) to you or to a third party. We will provide to you, or a third party you have chosen, your personal data (or that of your child) in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent:**

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

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

No fee usually required

You will not have to pay a fee to access your personal data, or that of your child (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.

What we may need from you

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 that of your child (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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Glossary

NEST Management Limited is the company providing software management systems and services including, but not limited to, payment collections processes to our Clients for the tuition and other related services the Clients provides to their students and customers.

Client means the business or individual providing the Events to you including but not limited to Martial Arts or Dance.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you or your child (both positive and negative) and your rights before we process your personal data (or that of your child) for our legitimate interests. We do not use your personal data (or that of your child) for activities where our interests are overridden by the impact on you or your child (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you or your child in respect of specific activities by contacting us.

Performance of Contract means processing your data (or that of your child) where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data (or that of your child) where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

In addition, we may need to pass on your personal data (or that of your child) to additional third parties such as tax authorities, regulators and other authorities.

We may also give such information to others who perform services or maintenance of our technology, in these cases we will only allow access to our systems against a confidentiality agreement.

12. Contact Details

The Data Protection Manager
NEST Management Limited
Registered office: 3.2/3.3 Wilford Business Park, Ruddington Lane, Nottingham, NG11 7EP
Tel: +44 (0) 115 945 5030
E-mail: datamanagement@nestmanagement.co.uk

13. Changes to our privacy notice

Any changes we may make to our privacy policy in the future will be posted [on this page](#) and, where appropriate, notified to you by e-mail. However, we advise that you check this page regularly to keep up to date with any necessary changes.

PN Events/V1.0