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Privacy Notice

Clients

Third party service providers

Website users

Contacts

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May 2018

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Piroska Koch Dance Center (Piri Ballet)

Rue Juste-Olivier 22

1260 Nyon

Switzerland

## PIROSKA KOCH DANCE CENTER (PIRI BALLETT)

### PRIVACY NOTICE

#### CLIENTS, THIRD PARTIES, WEBSITE USERS AND CONTACTS

##### 1. Introduction

Piroska Koch Dance Center (“Piri Ballet” or “we”) is committed to protecting the security and privacy of EU and Swiss data subjects’ (“you”) personal data when processing the same. Piri Ballet endeavours to ensure that any personal data we collect about you will, where relevant, be held and processed in accordance with the European General Data Protection Regulation (“GDPR”) and the Data Protection and Information Commissioner of Switzerland. The terms ‘personal data’, ‘data controller’ and ‘processing’ have the meanings given to them in GDPR (which can be accessed [here](#)), unless otherwise indicated.

##### 2. Scope

This Privacy Notice demonstrates how we handle the personal data you provide to us, or which we collect about you, in the following ways (your “Data”):

- a) by you submitting Data to us through our website [www.piriballet.ch](http://www.piriballet.ch) or from what we learn about you from your visit to our website;
- b) by you or a third party (such as a ticket shop or an event location) submitting information to us when you purchase tickets for one of our events;
- c) by you or a third party (such as a ticket shop or an event location) submitting Data to us in the course of us providing services to you;
- d) by you or a third party (such as your employer) submitting Data to us where we are seeking to obtain services from you or a third party as a supplier/service provider;
- e) as a result of us using your Data (whether obtained from you, a third party or the public arena) to contact you about potential activities in connection with our services; and
- f) as a result of us collecting Data about you from third party sources such as organisers of events we sponsor or other publicly available sources, such as websites.

##### 3. Identity and contact details of data controller

For the purposes of GDPR, Piri Ballet is acting as a data processor and controller of your Data.

If you have any queries regarding this policy or complaints about our use of your Data, please contact us at [contact@piriballet.ch](mailto:contact@piriballet.ch) or feel free to contact any of our staff directly. If you would rather contact us by post, please use the following address:

Piroska Koch Dance Center

Rue Juste-Olivier 22

1260 Nyon

Switzerland

#### **4. What we use your Data for**

The table in Schedule 1 to this Privacy Notice sets out the categories of your Data that we hold, the purposes for which we may process your Data and the legal basis for the processing.

#### **5. Data security**

We have put in place appropriate security measures to prevent your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Data to those individuals who have a business need to know.

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

#### **6. Who we share your Data with**

In exceptional cases, we may be required to share your Data:

- a) where we are required to do so by law or enforceable request by a regulatory body;
- b) where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; or

- c) if we sell our business, go out of business, or merge with another business.

## 7. Retention Period

We will only retain your Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax, regulatory or reporting requirements. To determine the appropriate retention period for your Data, we consider the amount, nature, and sensitivity of your Data, the potential risk of harm from unauthorised use or disclosure of your Data, the purposes for which we process your Data and whether we can achieve those purposes through other means, and the applicable legal requirements

As a general rule, this means that your Data will be stored for a maximum period of 6 years from the date on which our relationship with you ends, after which time it will be deleted if it is no longer required for the lawful purpose(s) for which it was obtained.

## 8. Your rights in relation to your Data

Under the GDPR, you have the following rights in relation to how we process your Data:

- a) **right to request access:** you may obtain confirmation from us as to whether or not your Data is being processed and, where that is the case, access to your Data;
- b) **right to rectification and erasure:** you have the right to obtain rectification of inaccurate personal Data we hold concerning you and to obtain the erasure of your Data without undue delay in certain circumstances;
- c) **right to restriction of processing:** you may require us to restrict the processing we carry out on your Data in certain circumstances;
- d) **right to data portability:** you have the right to receive your Data in a structured, commonly used and machine-readable format;
- e) **right to withdraw consent and object to processing:** where you have provided your consent to us processing your Data, you have the right to withdraw your consent at any time. Additionally, where we are relying on legitimate interests to process your Data you have the right to object to such processing. You also have the right to object to direct marketing which uses your Data. This can be done by emailing [contact@piriballet.ch](mailto:contact@piriballet.ch) at any time; and
- f) **right to lodge a complaint:** you may lodge a complaint with any supervisory authority in the EU. The supervisory authority for Switzerland is the Data Protection and Information Commissioner of Switzerland. A list of the EU data protection authorities can be found [here](#).

For further information on your rights, please see the European Commission's website [here](#).

Please note that, in circumstances where you are seeking to exercise your rights as a data subject, we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that your Data is not disclosed to any person who does not have a right to receive it.

#### **9. Additional Information**

We do not undertake automated decision-making or profiling of your Data.

We keep our data protection policy (including this Privacy Notice) under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our Privacy Notice at which point you will be given the option to request that we cease processing your Data.

## Schedule 1

### Categories of data processed, purposes for processing and legal basis

Data subject	Categories of data	Purpose	Legal basis for processing
Website users	Personal details	Direct marketing	Legitimate interests
		Responding to queries	Consent
Third party service providers	Personal details	Direct marketing	Legitimate interests
	Goods and services provided	Discharging contractual obligations	Legal compliance
Contacts	Personal details	Direct marketing	Legitimate interests
		Responding to queries	Consent
		Surveys	
Clients	Personal details	Direct marketing	Performance of contract
	Financial details	Client activities	Legitimate interests
	Goods and services provided	Surveys	Legal compliance Consent

## Interpretation

- Consent:** in the context of the table above, should be construed as follows:
- a) Website users: to the extent relevant consent given by the relevant user clicking on an 'I consent' button embedded on the website covering the processing of Data;
  - b) Contacts: may cover consent to process Data under GDPR but is also aimed at consent to receive marketing communications under relevant marketing laws. Consent here will be by way of soft opt in which means that we will contact contacts and give them the opportunity to opt out of receiving further communications from us; and
  - c) Clients: consent given by our clients in our terms of business for us to process Data provided by our clients about data subjects in our capacity as data processor;
- Contacts:** any data subject entered in our relationship management database that is not a client;
- Direct marketing:** keeping data subjects informed of any activities undertaken by us which we believe may be of interest to the data subjects and this may include sending data subjects email and postal marketing from time to time, calling data subjects up or sending them requests to respond to a survey;
- Discharging contractual obligations:** covers our activities in connection with the discharge of our obligations under a contract with a third-party supplier or service provider. This will principally cover the processing of any Data provided by the counterparty;
- Client activities:** covers the day-to-day activities associated with our business;
- Legitimate interests:** in the context of the Piri Ballet business means the day to day activities that we undertake to service client work (i.e. conducting dance classes) together with any associated middle and back office support activities as are more particularly set out in Schedule 2 to this Privacy Notice;
- Personal details:** this is information about you that you give to us by providing your business card to us or filling in forms on our website (or other forms that we ask you to complete), or corresponding with us by telephone, post, email or otherwise; it may include, for example, your name, company, business and/or private address,

email address and telephone numbers, date of birth; information about your business relationship with Piri Ballet; and information that our website and other systems collect about you.

**Responding to queries:**

covers the processing of your Data (name, telephone number and email address) for the purposes of responding to any questions sent to us using the [contact@piriballet.ch](mailto:contact@piriballet.ch) email address, which is presented on the website. In responding to your query, your contact details will be stored; and

**Surveys:**

from time to time we may use client and contact details (name and contact details) to send individual data subjects survey requests; such requests are entirely optional and will contain further details of any processing activities that we will undertake in connection with the Data provided.

## Schedule 2

### Legitimate interests

1. Preventing fraud
2. Direct marketing
3. Ensuring network and information security
4. Reporting possible criminal acts to a competent authority
5. Enforcement of legal claims (out of court)
6. Whistleblowing and prevention of money laundering
7. Physical, IT and network security
8. Processing for (market) research purposes
9. Processing in order to provide services
10. Compliance
11. Internal risk management
12. Creating employment relationships
13. Recordkeeping and disclosure
14. General financial and regulatory reporting to authorities