



# KRAV MAGA COMBAT ACADEMY

Privacy Notice

April 2024

## ABSTRACT

This Privacy Notice explains how Krav Maga Combat Academy collects, uses, stores, and protects your personal information. Crafted in simple language for clear understanding by adults and children alike, it details your rights over your data and the measures we implement to ensure your privacy and data security. We are committed to transparent practices and compliance with applicable data protection laws, ensuring that your information is handled responsibly. This document also provides guidance on how to contact us for any data-related inquiries or concerns.

**Laura Palmariello**

Data Protection Officer

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## Introduction

Welcome to Krav Maga Combat Academy (KMCA). Just as we are dedicated to ensuring your physical safety and the safeguarding of children and vulnerable individuals through our Krav Maga training, we are equally committed to protecting and respecting your privacy. Our approach to personal safety extends to carefully handling your personal data. This policy details how we manage and use the personal information we collect from our members, visitors, instructors, suppliers and volunteers.

## Who We Are

KMCA operates as a soletradership, run by Matt Leach. KMCA is the data controller for the information it collects and we are registered with the ICO, registration number: ZB294811.

You can reach out to us at [kravmagacombatacademy@email.com](mailto:kravmagacombatacademy@email.com) with any questions related to this privacy policy or any other matters concerning our club and its operations or you can call us on 07921 079 457.

You can also contact our Data Protection Officer, Laura Palmariello in relation to concerns you have in relation to this privacy notice and our processing activities, on [laura@info-safe.co.uk](mailto:laura@info-safe.co.uk) or 07943 879 142.

## Purpose & Legal Basis

Every piece of personal information we collect is gathered for a specific purpose, and each type of data requires a legal basis for its use. Further details about legal basis can be found [here](#).

In this section, we outline the categories of data we collect, the purpose for which it is used, and the legal basis for its processing. We will only use your information for the purposes stated here.

### Photographic and Video Content

To uphold the principles of lawfulness, fairness, and transparency—the cornerstones of data protection—we want to make you aware that photography and videography are integral parts of our activities at Krav Maga Combat Academy (KMCA). These images and videos may be used publicly for promotional purposes.

You always have the right to object to the use of your or your children's images. However, given the volume of classes, instructors, and students we handle, we cannot automatically recall previous objections for practical reasons. Therefore, objections need to be communicated to an instructor at the start of each session where photography or videography is taking place. ***We will never mention a child's name unless you have given us explicit consent to do so.***

Please see the table below for other data that is collected, processed and stored, its purpose and its legal basis.

Data or Data Category	Purpose	Legal Basis
<p>First Name, Last Name, Age and Email address, your social media profile and any other details you provide us with out of your own accord.</p>	<p>To respond to any enquiries you have made with us.</p> <p>To check in with you after any trial lessons.</p> <p>We will usually send reminders to you when you have booked a trial lesson and check in with you after you had your trial lesson.</p> <p>To ask you for feedback in relation to our services.</p>	<p><b>Legitimate Interest</b> to communicate with you after you have initiated contact as enquired about our services.</p> <p>You can opt-out of communications or change your preferences at any time.</p>
<p>Payment Information. We use third parties to process this or you pay us directly. We do not store your payment details.</p>	<p>To take payment for membership, merchandise or events.</p>	<p><b>Contract</b></p>
<p>Special Category Data (i.e. Health Data, Sexual Orientation)</p>	<p>We do not ask for this information, however you may give it to us to understand any limitations and whether you can safely participate in Krav Maga training or other concerns you would like to raise with us. You do not have to give us this information if you do not want to, however we do ask that you confirm you are fit to participate in Krav Maga.</p>	<p><b>Explicit consent</b>; OR vital interest in emergencies.</p>
<p>First Name, Last Name, Title, Contact Details, Address, Age</p>	<p>To manage memberships, communicate with you about your membership and any club news.</p>	<p><b>Contract</b>; to administrate and facilitate your membership;</p> <p>and <b>Legitimate Interest</b> for marketing in relation to our club – you can opt out of this by updating your preferences in any communication you receive, responding to the communication by letting us know you would like to opt out or by contacting our Data Protection Officer.</p>

Next of Kin Contact Details	To communicate with your next of Kin in an emergency	<b>Vital Interests</b> – in case of an emergency
Parents Contact Details	To communicate with parents about their children’s membership and any club news. <b>Please note that for safeguarding purposes, we only communicate with children at our classes and only in person.</b>	Contract – to administrate and facilitate your children’s membership and communicate with you
Marketing preferences	To tailor and deliver targeted marketing communications based on individual preferences and interests.	<b>Consent</b> – you explicitly opt-in to receive marketing communications; <b>Legitimate Interest</b> – to market our services to existing members.
Surveys, User Feedback	To gather feedback on our services and classes to enhance quality and satisfaction.	<b>Legitimate Interest</b> – to understand member satisfaction and improve services based on feedback.
<b>Dietary Preferences or Requirements</b> (if food is provided at any events or sessions)	To ensure suitable catering options are available at our events or classes.	<b>Consent</b> – explicitly obtained to cater to dietary needs.
Attendance and Performance Data	To track attendance, monitor progress, and ensure the effectiveness of our training programs and to establish whether you can attend gradings.	<b>Contract</b> – to fulfil out training commitments to you
Enhanced DBS Checks on Instructors	To ensure you meet the criteria to be an instructor at KMCA.	<b>Contract</b> as a legal basis & <b>Legal Obligation</b> as a condition for processing special category data -  Safeguarding Vulnerable Groups Act 2006  Children Act 1989 and Children Act 2004
Training Certificates/Records for staff, instructors and volunteers	To ensure you meet the criteria to be an instructor at KMCA.	<b>Contract</b> – we require you to complete a certain set of training courses as part of your employment, depending on your role

Event attendance/ Grading records	<p><b>Organisational Logistics:</b> Managing the practical aspects of running events and gradings, such as scheduling, participant lists, venue coordination, and resource allocation.</p> <p><b>Communication:</b> Sending information and updates to participants about the event details, changes, results, and feedback.</p> <p><b>Performance Evaluation:</b> Assessing participants' performance during gradings or competitions, recording scores or rankings, and determining eligibility for advancement or awards.</p> <p><b>Safety and Security:</b> Ensuring the safety of all participants, including handling any medical information or emergency contact details as necessary during the event.</p>	<b>Contract</b> - as part of your membership ; legal obligation for health and safety purposes.
Insurance Certification information	To ensure that our instructors are insured to deliver Krav Maga Training	<b>Contract;</b> <b>Legal Obligation</b>

We urge you to discuss this privacy policy with your older children so they are also informed of their rights to be informed and to object when they are of the age of competency.

## Cookie Policy

### What Are Cookies?

Cookies are small text files that are placed on your device (computer, tablet, or smartphone) when you visit websites. They help make websites work more efficiently and provide information to the site owners.

### How We Use Cookies

Krav Maga Combat Academy uses cookies to enhance your browsing experience. Here's how:

**Remembering Your Preferences:** This helps tailor our content to your needs and remembers your settings across our site.

**Improving Site Performance:** By analyzing how our site is used, we can identify and address performance issues, improving functionality.

**Marketing and Advertising:** Cookies track the effectiveness of our advertising and tailor marketing to your interests based on your online activity.

## Types of Cookies We Use

**Essential Cookies:** Necessary for the website to function properly. They include, for example, cookies that enable you to log into secure areas.

**Performance Cookies:** These cookies collect information about how visitors use a website, like which pages visitors go to most often, and if they get error messages from web pages.

**Functionality Cookies:** Allow the website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features.

**Targeting or Advertising Cookies:** These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns.

## Managing Cookies

You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our site may be restricted. You can change your preferences on our website at any time by clicking on the settings button in the bottom left corner.

## Consent

By continuing to browse or use our site, you agree to our use of cookies as described in this Cookie Policy.

## Storing your Data

When storing your personal data, Krav Maga Combat Academy (KMCA) prioritises security and confidentiality. We implement robust and proportionate security measures to protect your information from unauthorised access, alteration, or destruction. Access to personal data is strictly limited to individuals within KMCA who need it to perform their job responsibilities.

## Third-Party Providers & Contractors

In our operations, we rely on third-party service providers for various functions such as payment processing, data management, and marketing assistance. When engaging with third-party providers, we rigorously assess their privacy and security practices. We take the necessary steps to ensure that:

- **Contracts and Agreements:** All third-party individuals (including instructors) are bound by contract to maintain the confidentiality and security of the data they process on our behalf and to comply with relevant data protection laws.
- **Security Standards:** We seek assurances that providers implement high-standard security measures that are comparable to our own, especially when handling sensitive or special categories of personal data.
- **Data Processing Agreements (DPAs):** We ensure that DPAs are in place, detailing the scope, nature, and purpose of the data processing they are undertaking, thereby enforcing compliance with our data protection standards.
- **Regular Audits:** We conduct regular audits or reviews of third-party services to verify compliance with agreed-upon security and privacy standards.
- **When using large organisations who provide us with products, instead of DPAs, DPIAs (Data Protection Impact Assessments) are in place to ensure the protection of your data**

## Reviewing Third-Party Privacy Policies

While we take all necessary precautions to protect your data, we strongly recommend that you review the privacy policies of our third-party providers to understand how they manage your personal information. It is important to be informed about how these entities handle data, especially regarding their practices for data retention, data security, and data sharing.

## List of Third-Party Suppliers

Here we list our third-party providers, description of their services and data processing activities as well as a link to their privacy notice.

### Instructors & Volunteers

We do not currently employ staff and our instructors are classified as third-party contractors. DPAs are in place and they are bound by our policies, processes and procedures, and regular data protection training is provided, depending on their role.

### Webcollect

We use this provider to administer our membership. All the information you enter when you register is kept on their platform. You can manage your membership directly through this provider and amend your membership details. Webcollect assures us that data is not transferred outside of the United Kingdom and that your data is kept on their systems with appropriate security measures. The data processing agreement can be found [here](#), which outlines our relationship with them in relation to your personal data.

### Go Cardless

Go Cardless is a sub-processor of Webcollect, used to process your membership payments. We do not store your personal card and payment details on our system. Their Privacy Information can be found [here](#).

### Google (Google Drive/Gmail)

We utilise Google for processing some of your personal information, such as attendance spreadsheets, contact details, and order information, as well as for hosting our email accounts. However, we do not store any of your special category data on Google Drive. This



use is primarily for administrative purposes. It's important to note that Google may transfer data outside of the United Kingdom, but they implement stringent measures to ensure the protection of personal data. For more detailed information about how Google processes data, both within and outside of the United Kingdom, please refer [to this link](#).

### Mail.com

We also use mail.com for emails, however, we only process information that you directly send to this email account, for enquiries or invoicing purposes for our hall hires. Their privacy policy can be found [here](#).

### WhatsApp

At Krav Maga Combat Academy, we use WhatsApp as a convenient channel to communicate with you regarding your membership and to share news and updates about upcoming events. By joining any of our WhatsApp groups, please be aware that your phone number and name—or profile name, depending on your privacy settings—will be visible to all members of the group.

Participation in these WhatsApp groups is entirely voluntary, and you are free to leave the group at any time.

We take care to ensure that membership in these groups is managed responsibly:

- **Membership Verification:** We add individuals to our groups only after verifying their membership status with the club, ensuring a secure and relevant community.
- **Consent:** Your inclusion in any group is based on explicit consent provided by you during the membership verification process.
- **Child Safety:** We do not knowingly allow children under the age of 18 to become members of our WhatsApp groups, adhering to our child protection policies. Please do not give us or add your children's phone numbers to us/with us.

We strive to maintain a family-friendly environment within our club and extend this approach to our communication groups. Members are generally not removed from groups after their membership ends unless they request to leave or if their actions have disrupted the group dynamics.

We encourage an open and respectful communication climate, and we trust all members to maintain the standards of decorum expected in a community bound by mutual respect and a shared interest in Krav Maga.

At Krav Maga Combat Academy, our WhatsApp groups also serve as a space for community interaction and light-hearted banter. We trust in the common sense of all our members to maintain a respectful and friendly tone. However, we recognise that sometimes lines can be crossed unintentionally. If you ever feel uncomfortable or offended by any exchange, please do not hesitate to contact us directly. We are committed to addressing any concerns swiftly and appropriately.

While we encourage a relaxed and informal atmosphere, it's important to remember that all interactions should remain appropriate and respectful. If banter goes too far or becomes offensive, we will intervene to ensure that our communication channels remain a positive space for everyone. As a community of adults, we rely on each member to contribute positively and uphold the respectful environment that defines our club.

Safeguarding concerns are treated with the utmost seriousness. We are dedicated to ensuring that our environment is safe for all members, especially the most vulnerable. Should any issues arise that affect the safety or well-being of our members, we will take immediate and decisive action in accordance with our safeguarding policies, which can be found on our website.

You can find WhatsApp's Privacy Notice [here](#).

## Facebook

At Krav Maga Combat Academy, we utilise Facebook as a platform to engage with our community, advertise our services, and respond to enquiries. Below are the details regarding how we manage data in relation to Facebook:

### *Advertising*

**Purpose:** We use Facebook to post advertisements and promotional content to reach existing and potential members. These ads are designed to inform you about our latest events, classes, and offers.

**Data Sharing and Processing:** Through Facebook Ads, we may use demographic data and user preferences to target our advertising more effectively. This data processing is governed by Facebook's own privacy policies and regulations.

**Consent and Control:** Users can modify their advertising preferences through their Facebook settings to control the types of ads they see.

### *Responding to Enquiries*

**Communication:** We monitor our Facebook page and respond to enquiries and comments posted there. This is part of our commitment to excellent customer service.

**Data Handling:** When you contact us via Facebook, we may collect the information you provide in your message to address your query effectively. This information will be handled in accordance with our privacy policy and Facebook's privacy guidelines.

We encourage you to read Facebook's privacy policy [here](#).

## Wix

Krav Maga Combat Academy uses Wix.com to host our official website and manage our online presence. Below, we provide details on how we use Wix in relation to data handling:

### *Website Hosting and Management*

**Data Processing:** Wix hosts our website and backend services, which means it stores all data we collect through our website, including personal information submitted through contact forms, (soon also membership sign-ups and the shop), and other interactive features.

**Security:** Wix implements security measures to protect stored data, ensuring that personal information is safeguarded against unauthorised access, alteration, and destruction.

### *Membership Management*

**Purpose:** We utilise Wix to manage trial lessons and soon also memberships and registrations. This includes processing personal data such as names, contact details, and payment information for membership dues.

Data Handling: Personal information collected for membership purposes is processed and stored on Wix servers. We use this data exclusively for managing club memberships, providing services to our members, and maintaining records in accordance with legal requirements.

### Online Enquiries

Communication: Visitors to our website can make enquiries via contact forms hosted by Wix. We collect information provided in these forms to respond to questions and provide requested information about our services.

### Payments

We use Wix to manage our shop and membership, including payment processing. Wix may use other third parties to assist with providing its services and we encourage you to read their privacy policy for more information. We have made necessary enquiries to ensure that Wix is compliant with data protection regulations and information security requirements.

## Transfers of Data out of the UK

First and foremost, it's important not to be alarmed by the transfer of data outside the UK. Such transfers are increasingly common in today's global digital landscape. This does not mean that your data is out of control or accessible by random individuals.

Transferring data outside the UK does mean that your information may be stored on servers located in other countries, and these transfers are conducted under strict regulatory conditions to ensure your data is protected. It often involves service providers that offer enhanced technological capabilities or specialised services that are not readily available within the UK.

These international transfers are managed with rigorous security measures and compliance with legal frameworks designed to safeguard personal data. This includes adherence to standardised contractual clauses approved by data protection authorities and, where applicable, additional measures to address any risks associated with the transfer. The goal is always to maintain the integrity and security of your data, ensuring that it receives a level of protection consistent with UK standards.

As an organisation, we do not directly transfer your data outside of the UK. However, some of the third-party services we use may do so. As data controllers, we are responsible for ensuring that these transfers are carried out responsibly. We have outlined our processes to demonstrate our accountability and to reassure you that we diligently verify and oversee our third-party providers to ensure they handle your data securely and in accordance with our standards. We will only use reputable organisations but we value your input and encourage you to give us feedback or inform us of any concerns you have in relation to transfers and in relation to this privacy notice in general.

In the table below we outline all transfers out of the UK and measures in place to protect your privacy and keep your data safe and secure.

<b>Third Party Provider/Software /System/APP</b>	<b>Transfers out of UK, if so, where?</b>	<b>Security and Protection Measures/Assurances in Place</b>
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Wix	Yes	<p>Wix processes data about individuals across the world and may transfer your Personal Information outside of your country. Your security, privacy and confidentiality are our top priority and that's why Wix conducts a vetting process that includes an assessment of the privacy laws in those countries to validate they have strong data protection laws. User's personal information is controlled by Wix.com Ltd. in Israel, which the European Commission considers as a country offering an adequate level of protection for the Personal Information of E.U. Member State residents (see <a href="#">here</a>).</p> <p>If you are in Europe, the U.K., or Switzerland, when we transfer your Personal Information to a location outside of Europe, We will make sure that (i) there is a level of protection deemed adequate by the European Commission or (ii) that the relevant Standard Contractual Clauses are in place (i.e., the applicable module of the Standard Contractual Clauses for the transfer of personal data to third countries pursuant to Regulation (E.U.) 2016/679 of the European Parliament and of the Council from June 4, 2021, as available <a href="#">here</a>, and the ICO's International Data Transfer Addendum to the E.U. Commission Standard Contractual Clauses version B1.0, in force from 21 March 2022, as it is revised under Section 18 of its Mandatory Clauses), or (iii) we comply with Data Privacy Framework as applicable to data transfers to the United States and specified in clause 5.4 below, or (iv) we use another legally recognized transfer mechanism in the applicable jurisdiction.</p> <p>We may store and process Personal Information in the USA, Europe, Israel, or other jurisdictions, whether by ourselves or with the help of our affiliates and service providers.</p> <p>Wix's data storage providers are contractually committed to protect and secure your data. Among other things, Wix will ensure that there is the adequate level of protection or that relevant Standard Contractual Clauses are in place for the international transfer of our EU users' data.</p> <p>When Wix transfers E.U. Personal Information to a third country that the European Commission did not find will adequately protect your information, Wix ensures that it has taken additional measures to comply with the European data protection laws.</p>
Go Cardless	Yes	<p>If you use our services to pay a merchant in another country, personal data will be transferred as necessary to complete this transaction. Personal data may also be stored and accessed by service providers located in other countries. For EU</p>

		individuals, it's important to note that some of our service providers are located in the United States or other countries that do not provide the same standard of data protection as the EU. Wherever we transfer data, we enter into contracts or seek other ways to ensure service providers treat data as required by law in the country where it was collected.
Webcollect	No	Not applicable
Facebook	Yes; Places that have infrastructure or data centres, including the United States, Ireland, Denmark and Sweden, among others Countries where Meta Company Products are available Other countries where their partners, vendors, service providers and other third parties are located outside of the country where you live, for purposes as described in their Privacy Policy.	relevant "adequacy regulations" from the UK; UK Standard transfer mechanisms approved by the UK Parliament (the International Data Transfer Agreement and the International Data Transfer Addendum) or rely on derogations provided for under applicable law to transfer information to a third country; In addition to the UK standard contractual transfer mechanisms, they also apply supplemental measures to ensure equivalent protection of your data when transferred.  <a href="#">More info</a>
WhatsApp	Yes; WhatsApp shares information described in the Information We Collect section of this Privacy Policy globally, both internally within the	Adequacy Decisions: We rely on relevant "adequacy regulations" from the UK Government which recognise that certain countries and territories outside of the UK ensure an adequate level of protection for personal information. We transfer information we collect from the UK to Israel and the EEA in reliance on such adequacy regulations. Standard Contractual Clauses: We utilise the UK standard contractual transfer mechanisms approved by the UK Government (the International Data Transfer Agreement and the International

	<p>Meta Companies, and externally with third parties in accordance with this Privacy Policy and our Terms. This includes places where the data centers we rely on are located, and where our other internal Meta Companies and external Third-Party Service Providers are located. These transfers are necessary and essential to enable us to provide the Services set forth in our Terms and globally to operate and provide our Services which allow you to communicate with users and businesses on WhatsApp around the world.</p>	<p>Data Transfer Addendum to the Standard Contractual Clauses approved by the European Commission). For example, WhatsApp uses Meta's global infrastructure and data centers, which are located around the world including Singapore and within the United States, to store the information described in the Information We Collect section of this Privacy Policy. For a copy of the standard contractual transfer mechanisms, please see our SCC Help Centre article.</p> <p>While transfers to countries that don't have an adequacy decision typically take place on the basis of the standard contractual clauses, in certain circumstances, transfers can also take place on the basis of exemptions provided for under data protection law. For example, sharing with law enforcement or in emergency situations where we learn that a person's life is at risk.</p> <p>More <a href="#">info</a>.</p>
Mail.com	Yes	<p>If you use our services to pay a merchant in another country, personal data will be transferred as necessary to complete this transaction. Personal data may also be stored and accessed by service providers located in other countries. For EU individuals, it's important to note that some of our service providers are located in the United States or other countries that do not provide the same standard of data protection as the EU. Wherever we transfer data, we enter into contracts or seek other ways to ensure service providers treat data</p>

		as required by law in the country where it was collected.
Google	Yes	<p>We maintain servers around the world and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in the <a href="#">Privacy Policy</a>. We also comply with certain legal frameworks relating to the transfer of data, such as the frameworks described below.</p> <p>Adequacy decisions</p> <p>The European Commission has determined that certain countries outside of the European Economic Area (EEA) adequately protect personal information, which means that data can be transferred from the European Union (EU) and Norway, Liechtenstein, and Iceland to those countries. The UK and Switzerland have adopted similar adequacy mechanisms. We rely on the following adequacy mechanisms:</p> <ul style="list-style-type: none"> <li>• <a href="#">European Commission adequacy decisions</a></li> <li>• <a href="#">UK adequacy regulations</a></li> <li>• <a href="#">Swiss adequacy decisions</a></li> </ul> <p>EU-U.S. and Swiss-U.S. Data Privacy Frameworks</p> <p>As described in our <a href="#">Data Privacy Framework certification</a>, we comply with the EU-U.S. and Swiss-U.S. Data Privacy Frameworks (DPF) and the UK Extension to the EU-U.S. DPF as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from the EEA, Switzerland and the UK, respectively. Google LLC (and its wholly-owned US subsidiaries unless explicitly excluded) has certified that it adheres to the DPF Principles. Google remains responsible for any of your personal information that is shared under the Onward Transfer Principle with third parties for external processing on our behalf, as described in the <a href="#">“Sharing your information” section of our Privacy Policy</a>. To learn more about the DPF, and to view Google’s certification, please visit the <a href="#">DPF website</a>.</p> <p>If you have an inquiry regarding our privacy practices in relation to our DPF certification, we encourage you to <a href="#">contact us</a>. Google is subject to the investigatory and enforcement powers of the US Federal Trade Commission. You may also refer a complaint to your local data protection authority and we will work with them to resolve your concern. In certain circumstances, the DPF provides the right to invoke binding arbitration to</p>

		<p>resolve complaints not resolved by other means, as described in <a href="#">Annex I to the DPF Principles</a>. We currently do not rely on the Swiss-U.S. DPF and the UK Extension to the EU-U.S. DPF to transfer personal information to the U.S.</p> <p>Standard contractual clauses</p> <p>Standard contractual clauses (SCCs) are written commitments between parties that can be used as a ground for data transfers from the EEA to third countries by providing appropriate data protection safeguards. SCCs have been approved by the European Commission and can not be modified by the parties using them (you can see the SCCs adopted by the European Commission <a href="#">here</a>, <a href="#">here</a>, and <a href="#">here</a>). Such clauses have also been approved for transfers of data to countries outside the UK and Switzerland. We rely on SCCs for our data transfers where required and in instances where they are not covered by an adequacy decision.</p>
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## How long we keep your data for

We retain your personal data only for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We are currently revising our retention schedule, which will be added to this privacy policy. In the meantime, please do contact us for more information in relation to how long we keep your data.

## How we dispose of your data

We take the security of your data seriously. We employ rigorous data disposal methods to ensure the secure deletion and destruction of personal data once it is no longer needed for business or legal reasons.

**Third-party Processors:** We engage third-party processors who must meet stringent data protection standards. We rely on their verified secure deletion and destruction methods, and we conduct regular checks to ensure these standards are maintained, in line with our commitment to data security.

**Data Tidy-Up Exercises:** We routinely review and clean up data across all our systems to ensure adherence to our defined retention periods.

**Secure Deletion Methods:** For information stored on our devices and within our emails, we use secure digital wiping techniques to delete data. Additionally, we ensure that deleted information is irrecoverable by removing it permanently from all folders and inboxes, including any backups.

**Continuous Improvement:** Our data disposal policies and practices are regularly reviewed and updated to comply with evolving data protection laws and to incorporate technological advancements in data security.



## How to withdraw consent and opt-out

You can use any prompts within communication that we send to you or simply respond to opt-out or change your preferences or you can contact us directly to do so.

Where we have relied on your consent for processing, you can contact our DPO at [laura@kravmagacombatacademy.co.uk](mailto:laura@kravmagacombatacademy.co.uk) to withdraw that consent.

You can also object to processing, where we have relied on legitimate interest, however please bear in mind that we may not be able to continue to provide our services to you where you opt out to processing as the type of processing may be crucial to our business activities.

## Data Protection Rights

Under UK GDPR, you have rights that you can exercise regarding the data we hold about you:

**Right to Access:** You can ask for a copy of your personal data. This is also called a subject access request.

**Right to Rectification:** You can ask to correct or complete data you think is inaccurate.

**Right to Erasure:** You can ask us to erase your personal data.

**Right to Restrict Processing:** You can ask us to restrict the processing of your data.

**Right to Object:** You may object to the processing of your data.

**Right to Data Portability:** You can ask that we transfer your data to another organization or to you.

We will not charge you to exercise your rights, however do bear in mind that some of these rights are not absolute and exemptions and/or redactions may apply. More information about this can be found on the ICO website [here](#).

You can exercise your rights by contacting [laura@dataprivacysimplified.co.uk](mailto:laura@dataprivacysimplified.co.uk).

## Data Security

We are committed to ensuring the security of your personal data. We understand the importance of protecting your information and take reasonable steps to ensure it is treated securely, in accordance with this privacy policy, and in line with data protection legislation.

### Key Security Measures:

- **Device Security:** We maintain strict access controls to a limited amount of devices where data is stored. Each device is secured with up-to-date antivirus software, firewalls, and strong password protocols to prevent unauthorised access.
- **Processor Compliance Checks:** We carefully select our third-party processors and routinely conduct checks to seek assurances that they adhere to the required standards of data protection legislation. We require all processors to commit to compliance through formal agreements.
- **Data Minimisation and Access Control:** We ensure that only essential data is collected and only authorised personnel have access to this data on a need-to-know basis, minimising the risk of exposure.

- **Regular Reviews:** We regularly review our data security practices to address any vulnerabilities and update them as necessary to respond to new security challenges and technological advances.

As a small business, while we may not have the extensive resources of larger organisations, we are proactive in leveraging cost-effective and robust security solutions that provide substantial protection for your personal data. We prioritise critical security measures that deliver maximum impact, ensuring that our practices are as effective as possible within our means.

By implementing these targeted and efficient security measures, we strive to safeguard your personal data against unauthorised access, alteration, disclosure, or destruction.

## Data Breaches/Incidents

We recognise the importance of securing your personal data and are committed to maintaining the trust you place in us. Despite our best efforts, no security system is impenetrable and data breaches can occur. Here's how we handle such incidents:

### Detection and Response:

- We have implemented robust measures to identify and respond to data breaches swiftly. This includes continuous monitoring of our systems and data, allowing us to detect potential security incidents promptly.
- In the event of a data breach, we assess the risks involved, and determine the appropriate response.

### Notification Procedures:

- Should a data breach occur that may pose a risk to your rights and freedoms, we will notify you without undue delay after becoming aware of the breach, as required by data protection legislation.
- We will also report such breaches to the relevant supervisory authority within 72 hours, as mandated by law, providing full details of the breach and the actions we have taken.

### Measures to Mitigate Damage:

- Following a breach, we take immediate steps to minimise any impact on the data subjects by securing our systems, changing passwords if necessary, and assessing the vulnerability that led to the breach.
- We will communicate with affected individuals regarding protective steps they can take to guard against potential adverse effects.

### Review and Documentation:

- Every incident is thoroughly documented and reviewed to understand how it occurred and how it was handled. This review helps us improve our security measures and response strategies.
- We continuously update our incident response plan and security measures based on lessons learned from actual incidents and ongoing risk assessments.

### Commitment to Continuous Improvement:

- We are committed to continually improving our security practices through regular training of our staff and upgrading our technology and processes. This ongoing commitment helps us prevent future breaches and maintain a high level of data security.

## Changes to Our Privacy Policy

This privacy policy may be updated from time to time and will be reviewed yearly by our data protection officer or when legislation changes/is updated. We will notify you of any changes by posting the new policy on this page and informing our members via email or other communication channels.

## Contact Us

If you have any questions about this privacy policy or our privacy practices, please contact us at:

Email: [laura@info-safe.co.uk](mailto:laura@info-safe.co.uk) | Mobile: 07943 879 142

This privacy policy is effective from 01.05.2024 with the next review due by 30.04.2025.

## Feedback and Concerns

If you have any concerns or are dissatisfied with any aspect of our service, we encourage you to reach out to us directly. We value the opportunity to resolve issues not only to your satisfaction but also to improve the experience for all our members. We are committed to being responsive and approachable.

## Right to Complain

Regarding privacy and data protection, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe that we have not handled your data in accordance with the law. You can find the contact details for the ICO [here](#).