Privacy Policy

- 1. We ask that you read this privacy policy (**Privacy Policy**) carefully as it contains important information on who we are, how and why we collect, store, use and share personal information via on www.weteachdrama.com, all associated sub-domains, web-apps and mobile apps (**Website**), your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.
- 2. This Privacy Policy is divided into the following sections:
- Who we are;
- Our Website;
- Our collection and use of your personal information;
- Transfer of your information out of the UK and EEA;
- Cookies and other tracking technologies;
- Marketing;
- Your rights;
- Keeping your personal information secure;
- How to complain;
- Changes to this Privacy Policy; and
- How to contact us.

Who we are

- 3. This Website is operated by We Teach Drama Ltd. We are a teaching resources service provider.
- 4. We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the UK General Data Protection Regulation (<u>UK GDPR</u>). We are also subject to the EU General Data Protection Regulation (<u>EU GDPR</u>) in relation to goods and services we offer to individuals in the European Economic Area (EEA). We are responsible as 'controller' of that personal information for the purposes of those laws.

Our Website

- 5. This Privacy Policy relates to your use of our Website.
- 6. Throughout our Website, we may link to websites owned and operated by certain trusted third parties. These other third-party websites may also gather information about you in

accordance with their own separate privacy policies. For privacy information relating to these other third-party Websites, please consult their privacy policies as appropriate.

Our collection and use of your personal information

- 7. We collect personal information about you when you access our Website, register an account with us, contact us, send us feedback, purchase services via our Website and/or complete customer surveys or participate in promotions via our Website.
- 8. We collect this personal information from you either directly, such as when you register with us, contact us or purchase services via our Website or indirectly, such as your browsing activity while you are using our Website (see 'Cookies and other tracking technologies' below).
- 9. The personal information we collect about you depends on the particular activities carried out through our Website. This information includes:
 - your name, location and contact details;
 - bank account and payment details;
 - details of any feedback you give us by phone, email, post or via social media;
 - information about the services we provide to you; and
 - your account details, such as username, login details.
- 10. We use this personal information to:
 - create and manage your account with us;
 - provide services to you;
 - customise our Website and its content to your particular preferences;
 - notify you of any changes to our Website or to our services that may affect you; and
 - improve our services.

Our legal basis for processing your personal information

- 11. When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.
- 12. The legal bases that we may rely on include:
 - **consent:** where you have given us clear consent for us to process your personal information for a specific purpose;

- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations); and
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third-party (unless there is a good reason to protect your personal information, which overrides our legitimate interests).

Further information—the personal information we collect, when and how we use it

13. For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

| When | What | How and why we use your information |
|------------------|------------------|---|
| information is | information we | |
| collected | ask for | |
| When you | Contact details: | We ask for this: |
| register with us | your name and | |
| and sign up for | email address. | to create and manage your account with us; and |
| our mailing list | | to communicate with you about your account and other products and services that may be of interest to you. We rely on consent as the lawful basis for collecting and using your personal information. We will keep your contact details until you close your account with us, or we close your account. |
| | | Your e-mail address will be shared with Convertkit who is our mailing list client. Your e-mail address will be shared with them so that we can send you solicited communications. For more information on how Convertkit process your personal data please see the Convertkit Privacy Policy. |
| When you | Your payment | We ask for this: |
| purchase our | information | |
| content | | to process your orders for content; and |
| | | to process refunds. |

| When | What | How and why we use your information |
|--|--|---|
| information is | information we | |
| collected | ask for | |
| | | This will be collected by our third-party payment provider. We rely on our contract with you as the lawful basis for collecting and using your personal information. Your payment information will be shared with Wix Payments. For more information on how Wix Payments process your personal data, please review the Wix's Privacy Policy. We do not store this information at all. |
| | | we do not store this information at all. |
| When information is collected | What information we ask for | How and why we use your information |
| When you use or otherwise access our Website | Browsing data and preferences in relation to our Website | in order to optimise the performance of the Website; and fully enable its functionality for you. This will be collected automatically by our cookie and third-party software analytics providers. We rely on consent as the lawful basis for collecting and using your personal information. We keep this information for as long as you give consent for us to collect it. For more information on cookies, please see our Cookie Policy. |

Who we share your personal information with

14. We routinely share your:

• payment details with our payment providers in order to process payments and issue refunds where applicable; and

- browsing habits with our software analytics providers in order to optimise the performance of the Website and fully enable its functionality.
- 15. Some of those third-party recipients may be based outside the United Kingdom and European Economic Area. For further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the UK and EEA'.
- 16. We will share personal information with law enforcement or other authorities if required by applicable law.
- 17. We will not share your personal information with any other third-party or for any other purposes.

Whether information has to be provided by you, and if so why

- 18. We require you to provide:
 - Contact details in order to register for an account with us; and
 - your payment information to enable us to facilitate payments on your behalf and process refunds.
- 19. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

The impact of our use of your personal information

20. Our use of your personal information will allow us to provide services to you and will result in your data being shared with our third-party service providers who will then be permitted to contact you for marketing purposes should you provide your consent.

Transfer of your information out of the UK and EEA

- 21. We may transfer your personal information to the following which are located outside the United Kingdom (UK) and European Economic Area (EEA).
- 22. Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK/EEA where:
 - the UK government or, where the EU GDPR applies, the European Commission has
 decided the particular country or international organisation ensures an adequate level
 of protection of personal data (known as an 'adequacy decision'); or
 - there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects.
- 23. These are explained below.

Adequacy decision

- 24. We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:
 - all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
 - Gibraltar; and
 - Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey,
 New Zealand, Switzerland and Uruguay.
- 25. The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.
- 26. Other countries we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

Transfers with appropriate safeguards

- 27. Where there is no adequacy decision, we may transfer your personal data to another country we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.
- 28. The safeguards will usually include using legally-approved standard data protection contract clauses. In relation to transfers to our overseas offices or other companies within our group, the safeguards may instead include legally binding rules and policies which have been approved by the UK data protection regulator.

Cookies and other tracking technologies

- 29. A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our Website. We use cookies on our Website. These help us recognise you and your device and store some information about your preferences or past actions.
- 30. For further information on cookies, our use of cookies, when we will request your consent before placing them and how to disable them, please see our Cookie Policy.

Marketing

31. We would like to send you information about our services, competitions and special offers, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by email, telephone, text message (SMS) or automated call.

- We would also like to share your information with selected third-parties so that they may send you information about their products and/or services, depending on what you agree with us.
- 33. We will only ask whether you would like us and other businesses to send you marketing messages when you tick the relevant boxes when you make a booking with one of our providers via the Website.
- 34. If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:
 - contacting us <u>info@weteachdrama.com</u>;
 - using the 'unsubscribe' link in emails; or
 - updating your marketing preferences in your account settings.
- 35. It may take up to 7 days for this to take place.
- 36. For more information on your rights in relation to marketing, see 'Your rights' below.

Your rights

- 37. Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:
 - access to your personal information and to certain other supplementary information that this Privacy Policy is already designed to address;
 - require us to correct any mistakes in your information which we hold;
 - require the erasure of personal information concerning you in certain situations;
 - receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
 - object at any time to processing of personal information concerning you for direct marketing;
 - object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
 - object in certain other situations to our continued processing of your personal information; and
 - otherwise restrict our processing of your personal information in certain circumstances.

- 38. For further information on each of those rights, including the circumstances in which they apply, see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.</u>
- 39. If you would like to exercise any of those rights, please:
 - email, call or write to;
 - let us have enough information to identify you (e.g. account number, user name, registration details);
 - let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
 - let us know the information to which your request relates including any account or reference numbers, if you have them.

Keeping your personal information secure

- 40. We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 41. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
- 42. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

- 43. We hope that we can resolve any query or concern you raise about our use of your information.
- 44. You have the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

Changes to this Privacy Policy

45. This Privacy Policy was published and last updated on 20th October 2021.

46. We may change this Privacy Policy from time to time and when we do, we will inform you the next time you access the Website.

How to contact us

47. Please contact us at info@weteachdrama.com if you have any questions about this privacy notice or the information, we hold about you or if you would like this Privacy Policy in another format (for example: audio, large print, braille).