



Privacy policy: Ways To Play Today baby/toddler classes

This privacy policy notice is served by Ways To Play Today. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, Ways To Play Today.
- "you", "the customer" refer to the person(s) attending our classes or events.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

Key principles of GDPR:

Our privacy policy embodies the following key principles [Article 5(1) and Article 5(2)];

1. (a) Lawfulness, fairness and transparency,
2. (b) Purpose limitation,
3. (c) Data minimisation,
4. (d) Accuracy,
5. (e) Storage limitation,
6. (f) Integrity and confidence,
7. (g) Accountability.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases:

The Information we collect

Personal Information

Ways To Play Today may collect and use the following kinds of personal information from you:

- *Contact Data*: Information that you provide for the purpose of booking one of our classes or events (such as name, email, phone, etc)
- *Identity Data* : login details (username and password)
- *Financial Data*: data you provide so that we can process payments for you including your Stripe account reference number
- *Transaction Data* includes details of classes you have booked and paid for

- *Marketing Data* includes your preferences in receiving marketing from us
- *Children's Data*: information about your child, including child's name, child's age, child's gender, any other useful information (eg allergies)

We also collect, use and share *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 it does not directly or indirectly identify you. However, if we combine or connect *Aggregated Data* with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this Policy.

Payment services are provided through Stripe so we do not obtain any bank details or credit or debit card information from our users.

Personal data you provide to us

From time to time you may provide to us personal data. This may be because:

- You access and interact with our social media or booking sites
- You create an account with our booking site
- You purchase classes with us
- You provide feedback or reviews to us
- You respond to a survey or questionnaire or enter a promotion or competition
- You sign up for our newsletter
- You otherwise contact us including with queries, comments or complaints

We shall process all such personal data in accordance with this Policy. Certain personal data is mandatory and will be provided to us in order that we can fulfil your request, for example to create an account on our website, and we shall make this clear to you at the point of collection of the personal data.

All personal data that you provide to us must be true, complete and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this and we may also report this to the appropriate authorities.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

Children's Data

When a Parent/Legal Guardian books a class, we ask you to provide some details about the child. This information is for the purpose of ensuring that the class is within the specified age range for the class, for tracking payment and to create a class register. We do not communicate directly with the minor. The information is provided with the consent of the Parent/Legal Guardian.

How we use your personal information

Ways To Play Today will only collect, use, share, and otherwise process the information we have about you for the purposes described in this policy where legally permitted. These legal bases include:

- For us to comply with a legal obligation, a court order, or to exercise and defend legal claims;
- For us to comply with a contractual obligation with you
- Where you have made the information manifestly public;
- Where you have given consent; and
- Where necessary for the purposes of Ways To Play Today's or a third party's legitimate interests . When we refer to legitimate interests we mean our or a third party's legitimate business interests in the normal running of our or their business which do not materially impact your rights, freedom or interests.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you and/or create your account and enable you to manage your account	Contact Identity	Performance of a contract with you
To enable Parents/Guardians to book a class	Contact Identity Children Financial	Performance of a contract with you
To manage your account including managing payments, returns and refunds	Contact Identity Financial Transaction	Performance of a contract with you Necessary for our legitimate interests (fraud-checking)

To manage our relationship with you such as notifying you about changes to our Terms of Service or this Policy, remind you when your information is out of date	Contact Identity	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests
To administer and protect our business and our social media and booking sites (including improving and fixing our service, analysis, testing, system maintenance, support, reporting and hosting of data)	Technical	a) Necessary for our legitimate interests (for running our business security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant digital marketing and advertisements to you and measure and understand the effectiveness of the advertising we serve to you	Contact Identity Usage Marketing Technical Location	Necessary for our legitimate interests (to analyse how customers use our website and manage our business accordingly)
To use data analytics to improve our social media/websites, products/services, marketing, customer relationships and experiences	Technical Usage Location	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Sharing your Data

For our legitimate interests, we may share any of personal data with our service providers, sub-contractors, consultants and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including IT service providers, group companies, accountants, auditors and lawyers.

We shall provide our service providers, sub-contractors, consultants and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous within their systems.

If we need to use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety then in doing so, we may share your personal data with third party authorities and regulatory organisations and agencies.

If we choose to merge, sell assets, consolidate or restructure, finance, or sell off all or a portion of our business by or into another company then the new owners may use your personal data in the same way that we do as set out in this Policy.

Marketing and spam

We know that you do not want spam or marketing calls from third parties, so we will never sell or rent your contact information to third parties, and we won't share it with a third party except as set out in this Policy.

You may consent to receive marketing email messages from us about classes, events and services, or we may send you marketing email messages for our legitimate interests as set out in our Terms of Use. You can choose to no longer receive marketing emails from us as set out above, by contacting us. Please note that it may take us a few days to update our records to reflect your request.

If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send to you marketing information. If you still have an account with us, we shall continue to email you in relation to your account only.

Securing your data

Ways To Play Today will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

However, you acknowledge that the internet is inherently insecure, and we cannot guarantee security of data sent over the internet. Information relating to electronic transactions entered into via our social media accounts or booking site will be protected by encryption technology.

Cross-border data transfers

Some or all of your personal data may be stored or transferred outside of the United Kingdom and/or European Economic Area (the **EEA**) for any reason, including for example, if our email server is located in a country outside the United Kingdom or the EEA or if any of our service providers are based outside of the United Kingdom or the EEA.

In addition, personal information that you submit for publication on our social media/booking sites will be published on the internet and may be available around the world. You agree to such cross-border transfers of personal information. Where we are required to transfer your data to another jurisdiction, particularly where the data is transferred out of the European Economic Area, it will only be transferred to countries that have been identified as providing adequate protection for personal data or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e., by entering into the European Commission's [Standard Contractual Clauses](#).

Data Retention

Ways To Play Today commits to retain personal data only for as long as is necessary, which is a requirement of law. Where we have no legal basis for continuing to process your personal data, we shall either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

For the avoidance of doubt, we may use anonymous data, such as usage data for research or statistical purposes indefinitely without further notice to you.

Updating this Policy

Ways To Play Today may update this Policy from time to time at our discretion and in particular to reflect any changes in applicable laws. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, we shall post a new version of this Policy on our social media/website. You should check this page occasionally to ensure you are familiar with any changes.

Contact Ways To Play Today

If you have any questions about this Policy or Ways To Play Today's treatment of your personal information, please write to: info@waystoplaytoday.co.uk

Your individual rights

Under the GDPR your rights are as follows:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Further information & third party guidance

- [Overview of the GDPR - General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)

Date privacy policy created: ____05/09/2025____

We commit to reviewing this policy annually.

Signed: ____Emily Giles____

Date: ____05/09/2025____