



Privacy Notice

This is the privacy notice for Primary Stars and Mega Stars. Primary Stars is our brand for the provision of PE support services to primary schools, and Mega Stars is our holiday club brand. This privacy notice covers both our Primary Stars and Mega Stars operations, and also covers our website primarystars.co.uk. We describe here the data we collect from you when you use our site, when you enquire about our services, when you use our services if you are a school or a parent, and also if you are one of our suppliers.

These are our reasons for collecting it, what we do with it and what your rights are.

Who are we?

We are Robert Farr & Laura Jones, a partnership trading as Primary Stars and Mega Stars. Our address is 1 Hall Rise, Ashbourne, Derbyshire, England, DE6 1RH.

You can contact us at the above address of via email using team@primarystars.co.uk.

We are the controller for the processing described in this privacy notice, and we are registered as a controller with the Information Commissioner's Office (ICO) registration number [ZB328531](#).

Where we are providing our PE support services to schools we may be processing personal data relating to your child on behalf of the school, for example to assess their fitness, monitor their progress and report back to their school. In that setting we are acting as a processor on behalf of the school and if you have any questions about the processing of personal data related to our in-school activities then please contact the school directly.

Purpose of processing

We process your personal data for a variety of purposes as set out in the table below, which also shows our lawful basis under UK data protection legislation (UK GDPR) for doing so.

Purpose	Lawful Basis under UK GDPR
Managing your enquiries via the website contact form or other channels	Our legitimate interests in responding to and managing your enquiry
Managing our relationship with you where you are a member of staff at one of our client schools	Our legitimate interests in managing our client relationships, managing our invoicing and payment collections, and arranging our in-school activities



Managing your enquiry and any subsequent order you place with us for the Mega Stars holiday clubs	Taking the steps necessary to enter into a contract with you, and then managing that contract
Managing our relationship with you as a parent of a child attending a Mega Stars holiday club	Our legitimate interests in managing our business and providing a safe and enjoyable experience for your child
Managing our relationship with you if a parent has provided your name and contact details as an emergency contact for their child when attending a Mega Stars holiday club	Our legitimate interests in protecting the safety of the child, and other children, when they attend a Mega Stars holiday club
Our direct marketing activities	Our legitimate interests in ensuring we appropriately manage, deliver or suppress direct marketing activity you have opted in to receive or opted out to decline to receive
Managing our relationship with you if you are one of our suppliers	Our legitimate interests in managing our commercial relationship, or (if you are a sole trader) because processing is necessary to manage the contract we have with you

Where we are relying on our legitimate interests you are free to object to that at any time. In the case of direct marketing activity (including newsletter subscriptions) we will ensure that we always cease to market our services to you should you object to our legitimate interests.

Data we collect

The table below gives information on the categories of personal data we process for each of the purposes shown above.

Purpose	Categories of Data Processed
Managing your enquiries via the website contact form or other channels	Name, contact details, details of enquiry
Managing our relationship with you where you are a member of staff at one of our client schools	Name, name of school, contact details, role in school
Managing your enquiry and any subsequent order you place with us for the Mega Stars holiday clubs	Name, contact details, booking details, payment details



Managing our relationship with you as a parent of a child attending a Mega Stars holiday club	Name, contact details, child's name and age, additional information about the child (e.g. special dietary requirements, allergies, medicines, medical conditions, disabilities etc)
Managing our relationship with you if a parent has provided your name and contact details as an emergency contact for their child when attending a Mega Stars holiday club	Name, contact details
Our direct marketing activities	Name, contact details, your opt-in/opt-out choices
Managing our relationship with you if you are one of our suppliers	Name, contact details and (if you are a sole trader) all commercial and financial records of our relationship

Special category data

There are additional rules we must follow if we collect certain types of more sensitive data, known as Special Category Data. These include details of your ethnicity, beliefs, health and sexuality.

If your child has additional requirements we need to accommodate, for instance due to a food allergy, or because they are taking medication, or if they have a specific condition we need to be aware of then we will be processing health related data which are special category data. We will process these data because we have asked for your explicit consent to do so and you have provided it.

How long do we keep your data for?

Where we are relying on our legitimate interests to process your data then we will keep your personal data until you object to our legitimate interests and we agree with your objection, or until the following default periods have elapsed after our last contact with you.

We will retain your personal data by default for the following periods:

Purpose	Retention Period
Managing your enquiries via the website contact form or other channels	1 year



Managing our relationship with you where you are a member of staff at one of our client schools	7 years
Managing your enquiry and any subsequent order you place with us for the Mega Stars holiday clubs	7 years
Managing our relationship with you as a parent of a child attending a Mega Stars holiday club	7 years
Managing our relationship with you if a parent has provided your name and contact details as an emergency contact for their child when attending a Mega Stars holiday club	1 year
Our direct marketing activities	1 year from last contact
Managing our relationship with you if you are one of our suppliers	7 years

Do we ever share personal data?

We will share your data if we receive a legitimate request from a law enforcement agency.

When you submit your personal data online your data is held by our partner who hosts our website.

When you make a booking for a Mega Stars holiday club you will be doing so via the Class4Kids website, an independent provider of booking services. Class4Kids operate as a separate controller and you should read their privacy information for further information.

If we are communicating with you via email or social media channels we will be sharing your personal data with those email and social media providers.

We also utilise external suppliers to provide a number of business support services. We always ensure that we have appropriate contracts in place to protect your rights when personal data are processed on our behalf by these third parties. There is further information regarding these suppliers in the “Where Do We Process Data?” section.

How do we keep your data secure?



We take sensible steps to keep your data secure and ensure we can uphold your rights and meet our obligations under UK GDPR:

- All data sent between your browser and our website are encrypted in transit,
- Access to personal data is role based: only those members of staff with a legitimate need will have access,
- Systems are password protected and multi-factor authentication is enabled where available,
- We ensure that appropriate contracts are in place with our processors to protect your rights, that the processors take appropriate security measures to safeguard your data, and that any international transfers are done correctly under UK GDPR,
- Our employees are all subject to an obligation of confidentiality, and receive training on data protection matters,
- We utilise appropriate technical and organisational measures to optimise the security of your personal data.

Your Rights

You have a number of rights relating to the processing of your data, if you would like to use them or have any questions then please contact us.

Where we are providing our PE support services to a school where your child is a pupil please contact the school directly if you wish to invoke any of your rights under UK GDPR.

We won't charge you for doing any of the following, however we may make a charge in the case of frequent repeat or unfounded requests:

- Awareness: You have the right to be fully informed about why and how we process your information. This privacy notice is intended to meet that requirement, but please do contact us if you have any questions,
- Access: You have the right to a copy of the data we hold about you and your child
- Rectification: If you think some of the data we hold is wrong then you have the right to ask us to correct it,
- Erasure: You have the right to ask us to delete the data we hold about you. Where we are holding the data to fulfil a contract with you or your organisation then we will need to retain the data in accordance with the data retention requirements shown above,
- Restriction: You have the right to ask us to restrict the processing of personal data whilst we check its accuracy, if you think the processing is unlawful, if you believe we no longer need to process the data but you need us to store it due to pending legal



claims, or when you object to our processing based upon our legitimate interests and we are assessing the validity of that,

- Object: Where we are processing your personal data based upon our legitimate interests you have the right to object to that. If your objection is valid (for instance in the case of any direct marketing activity) then we will stop processing your personal data for that purpose,
- Data portability: You can request a copy of your data in a digital format which you can then supply to another provider when we are processing your personal data under the lawful basis of performing a contract with you or because we have your consent,
- Automated decisions and profiling: You have the right, in certain circumstances, not to be subject to decisions based on automated processing (including profiling) if it has a significant or legal impact on you. This doesn't apply if the processing is necessary to fulfil a contract with you, or if you have given us your consent to do so. We do not currently use any technology to make automated decisions about you.

What happens when I follow links to other sites?

If you follow a link from our site to another site then you should read the privacy notice on the other site prior to providing your data to them.

In particular we use the Class4Kids site to manage bookings for Mega Stars holiday clubs, and you will be prompted to create an account with them which will enable you to use their services for all the providers who utilise their site.

Where do we process data?

We primarily process data in the UK however we use partners to help us deliver our services, some of these services will mean that your personal data are transferred outside of the UK.

Partner	Where do they process data?	What additional protections are in place to safeguard your rights if processing is based overseas
Microsoft	UK primarily, some USA transfers	Standard Contractual Clauses in place as part of the Microsoft licencing terms.



Google	USA	Standard Contractual Clauses in place as part of the Google licencing terms.
Website host (Wix)	Israel	Israel is deemed to be an adequate nation by the UK regulator (the ICO)
Mega Stars booking (Class4Kids)	UK	N/A

Making a complaint

Please contact us at the above address. You can also contact the Information Commissioner's Office (ICO) on their helpline 0303 123 1113 or online at www.ico.org.uk. If you should contact the ICO they will normally ask you to contact us first.