

Boogie Effect® Limited (“Boogie Effect®”) are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018, once enacted. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better experience.

We have published this notice to help you understand

- how and why Boogie Effect® collect information from you;
- who we share your information with, why and on what basis;
- what your rights are.

If we make changes to this notice we will notify you by updating it on our website. Boogie Effect® is known as the ‘Data Controller’ of the personal data you provide, and we will sometimes refer to ourselves in this notice as “we” or “us”. By Data Controller, this means Boogie Effect® determines the purposes and way in which any personal data are, or will be, processed.

Should you need to contact us please write to:

Boogie Effect® Limited, Mounthoolie, Tynron, Thornhill, Dumfries & Galloway, DG3 4LE  
or email [admin@boogieeffect.com](mailto:admin@boogieeffect.com) quoting Date Privacy Enquiry.

This privacy notice was last updated on 22<sup>nd</sup> May 2018.

## What information we collect and why?

### ***BOOGIE EFFECT® class participants:***

When you attend your first BOOGIE EFFECT® class, we will ask you to provide some personal information such as;

- full name
- address
- date of birth
- contact numbers (and possibly email address)
- Emergency contact name & number
- General medical history

### ***LICENSED BOOGIE PROS:***

When you register to become a licensed *BOOGIE Pro*, a BOOGIE EFFECT® Membership will be created. So we can set this up we will ask you to provide some personal information such as;

- full name
- address
- Qualifications & Certifications
- contact numbers and email address.

## How do we use your information?

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement e.g. maintaining Licensed *BOOGIE Pro* Memberships and license obligations.
- Consent – where you agree to us using your information in this way e.g. for storing your payment card details.

- Legitimate Interests - this means the interests of Boogie Effect® in managing our business to allow us to provide you with the best products and service in the most secure and appropriate way e.g. Updating you with class information.
- Legal Obligation – where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so. Where we list legitimate interests as a reason, we also describe below what we believe these legitimate interests are.

<b>What we use your personal information for</b>	<b>Our reasons (legal basis)</b>	<b>Our explanation of Boogie Effect® 's legitimate interests</b>
Set up your Boogie Effect® Pro Membership	• Legitimate obligation / interests	Process efficiency in dealing with such activity.
Informed judgement to provide fitness advice based on Medical information	• Legitimate Obligation / interests	Provide informed health & fitness advice including modifications to exercises to ensure safe and enhanced execution of programme.
Emergency contact of family/friend/	• Legitimate interests	To make contact with designated person in event of medical/mental emergency.
Class notifications and updates	• Legitimate interests	Provide up to date information regarding classes, including cancelations, changes to timetable and new classes.
Manage your Pro Membership / provide customer services to you. This may include: transfers to Third Countries who undertake customer services/communications activities	• Legal obligation/ Legitimate interests (depending on nature of services)	Keeping our records up to date, handling our customer contact efficiently and effectively, working out which of our products and services may interest you and telling you about them. Ensuring the Boogie Pro has access to all the resources required to fulfil their license duties.
Undertake website personalisation and administration.	• Legitimate interests	Developing products & services that attract and retain customers. Improving customer interaction with our sites.
Marketing communications to inform you of special offers, promotions, new lines and Sales. Provide you with online advertising.	• Legitimate interests	Developing products & services that attract and retain customers. Improving customer interaction with our sites.
Notifying you about enhancements to our services, such as changes to the website and new services that may be of interest to you.	• Legitimate interests	Developing products & services that attract and retain customers. Improving customer interaction with our sites.
Contact you to undertake customer satisfaction surveys, invite you to provide product reviews or for market research.	• Legitimate interests	Developing products & services that attract and retain customers. Improving customer interaction with our sites.
Maintaining network and data security	• Legitimate interests	To maintain the security of our network this in turns helps us to maintain the safety and confidentiality of your information.
Demand forecasting, management information and research	• Legitimate interests	We use information about shopping habits, products bought and volumes, to help us to respond to demand, ensure the right products get to the right areas and to help us develop our services.

## Who we may share your information with and why

Boogie Effect® works with a number of trusted agencies and businesses in order to provide you the high quality service you expect from us such as marketing companies, web hosting services and ecommerce. Some examples of the categories of third parties with whom we share your data are:

### **IT Companies**

Boogie Effect® works with business who support our website and other business systems (i.e Wordpress, Kualo, Whitefall Designs)

### **Marketing Companies**

We work with marketing companies who help us manage our electronic communications with you i.e. Mailchimp.

### **Payment processing**

Boogie Effect® works with trusted third party payment processing providers in order to securely take and manage payments online i.e. Paypal, WooCommerce

### **Your Rights**

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.

## How we share your information

### **IT Companies**

**Wordpress:** This is our Web builder site. If you are a registered BOOGIE Pro Member, then your name, email, password and location will be stored within in our Membership data base. Our Website is secured with an up to date https Security certificate to protect against rouge login attempts and hacking.

**Kualo:** Kualo is our webhosting service. They do not collect data relating to our site visitors. They only collect data from their site users (i.e Boogie Effect Ltd). Therefore, we do not share your personal data with them.

**Whitefall Designs:** This is our IT support. They have access to our Wordpress site builder and therefore may have access to the personal data of Boogie Pro Memberships. Confidentiality is fundamental and we ensure this third party also complies with GDPR law.

### **Marketing Companies**

**Mailchimp:** When you subscribe (with consent) to our email updates & marketing, your Name and email are added to our database stored via our Online Marketing host Mailchimp. We offer both Opt In and Opt Out options and never assume consent for your data to be used for Update or Marketing purposes. Mailchimp conform to GDPR law regarding your personal data. To find out more about the agreement between Boogie Effect Ltd and Mailchimp regarding your personal data by following the link at the bottom of this page.

### **Payment processing**

**Paypal:** This is the Payment Processing platform we use to process your transactions via our website. They will require your name, email and credit card details to process any payments. Boogie Effect Ltd do not have access to or store your Credit/Debit Card details. For more information on Paypal privacy policy [visit www.paypal.com/uk/webapps/mpp/ua/privacy-full](https://www.paypal.com/uk/webapps/mpp/ua/privacy-full)

**WooCommerce:** This is the online Payment Processing Add-On we use in our Website to help us process payments via Paypal and manage our website Subscribers/Boogie Pro Memberships. Personal data they may collect are Subscriber Sign Up info (name & email), site comments and credit card information in order to process orders. They may also collect site visitor location info via your devices IP address (they will not collect identifiable information such as name & address) or analytics purposes. You can view their Privacy Notices for Site Visitors in full at the bottom of this page.

## Transfers to third countries

Boogie Effect® may also works with partners who may make use of cloud and/or hosted technologies. We will undertake data security due diligence on our partners to ensure that that these partners conform to appropriate accreditations.

Wherever transfers of data to third countries occurs Boogie Effect® will put in place an appropriate contractual provisions to

ensure that there are strict rules regarding both the confidentiality and security of your information. To find out more please contact us at [admin@boogieeffect.com](mailto:admin@boogieeffect.com)

## Keeping in touch with you

We want to keep you up to date with information about special offers and improvements to our service or website. When you complete your Medical ParQ form or BOOGIE Pro Profile, we will ask you if you want to receive this type of marketing information. We operate a double Opt In/Out platform via our host provider, Mailchimp.

Boogie Effect® will not share your information with companies outside of Boogie Effect® Ltd for their marketing purposes. Boogie Effect® Ltd includes Boogie Effect Australia.

If you decide you do not want to receive this marketing information you can request that we stop by writing to the Data Protection Boogie Effect Ltd, at the address provided above, emailing [admin@boogieeffect.com](mailto:admin@boogieeffect.com) or the unsubscribe link within the email.

You may continue to receive mailings for a short period while your request is dealt with.

## How long we keep your information

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We will retain your personal information for 1 year (from the signed date on your Medical ParQ) in the case of class participants; and for the entire duration of your membership/license in the case of licensed BOOGIE Pros.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

## What are your rights?

You are entitled to request the following from Boogie Effect®. These are called your Data Subject Rights and there is more information on these on the Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk)

- Right of access –to request access to your personal information about how we process it
- Right to rectification –to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- Right to erasure (also known as the Right to be Forgotten) – to have your personal information erased.
- Right to restriction of processing – to restrict processing of your personal information
- Right to data portability - to electronically move, copy or transfer your personal information in a standard form
- Right to object - to object to processing of your personal information
- Rights with regards to automated individual decision making, including profiling –rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights please contact [admin@boogieeffect.com](mailto:admin@boogieeffect.com) quoting Data Subjects Rights Enquiry.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the ICO website [www.ico.org.uk](http://www.ico.org.uk) where your personal information has or is being

used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

## Cookie Notice

By continuing to use the "Site" [www.boogieeffect.com](http://www.boogieeffect.com), you are agreeing to our use of cookies in the manner described in this notice.

### What are cookies?

Cookies are small text files that are stored on your browser or the hard drive of your computer or other device when you visit the Site. This allows the Site to recognise you as a user either for the duration of your visit (using a 'session cookie') or for repeat visits (a 'persistent cookie'). They are not harmful and do not contain any information such as your home address, date of birth or credit card details.

If you would like more information on types of Cookies, including cookies safety, how to turn off and how to opt-out, please visit <https://www.aboutcookies.org/page/2/> or <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>.

### What do we use Cookies for?

- They enable you to transact, whilst other non-essential cookies enable us to give you an enhanced, personalised web experience.
- To personalise and improve your customer experience.
- To allow you to securely sign in to your BOOGIE Pro Account, so that you can use "My Account" features such as choreography, marketing material and making payments.
- To recognise the device that you are using.
- To store the content of your online shopping bag whilst you browse the site and to complete an order.
- To record the areas of the Site that you have visited, products you have viewed and time spent browsing, as well as the products you purchased. Boogie Effect® uses this information to help make the website more user friendly, develop our Site design and to continuously improve the quality of the service we provide.
- To distribute visitors to our Site evenly across platforms to ensure the content is served at the fastest possible speed.
- We also offer you the facility to share your experience on our Site through social media sites such as Facebook and Twitter. By using these features, you are consenting to allow cookies from these providers. More information about how these providers use cookies can be found at their websites.

Cookies are an essential part of how our Site works, as they remember certain information about a visitor. Boogie Effect® uses First Party cookies (these are placed there and used solely by Boogie Effect®) and Third Party cookies (these are placed there by third parties we work with).

### Details of our Cookies

To help you understand further how we use cookies, we have divided them into Sub Categories which allows you greater control over the cookies you allow.

**NECESSARY COOKIES** - Necessary cookies help make a website usable by enabling basic functions like page navigation, security and access to secure areas of the website. The website cannot function properly without these cookies.

**STATISTICS COOKIES** - Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

**THIRD PARTY COOKIES** – Some third party cookies are set by services that appear on our pages. They are set by the operators of that service and are not in our control. We invite the user to check the privacy policy and how to cancel the cookies set by these services at the addresses listed in the sections below. Third parties have full responsibility of the third parties cookie. Boogie Effect Ltd does not accept liability for the contents and cookies of external links, which can be changed without notice by the respective operators

Full details of COOKIES used within our site can be found at [www.boogieeffect.com/privacy-policy](http://www.boogieeffect.com/privacy-policy).

## Opting Out

When visiting our website, you will be presented with our PRIVACY POLICY & COOKIES Pop Up. Here you can set your set your Privacy & Cookies preferences. You must acknowledge you have read our Privacy Policy and understand out use of Cookies before proceeding to our website. If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to delete or block any cookies that are already on your machine (including Google Analytics cookie) please visit [AboutCookies.org](http://AboutCookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of this website.

To opt-out of third-parties collecting any data about your interaction on our website, please refer to their websites for further information.

If you have any questions, concerns, or comments about our privacy policy you may contact us using the information below

## Contact

Boogie Effect® Limited, Mounthoolie, Tynron, Thornhill, Dumfries & Galloway, DG3 4LE  
or email [admin@boogieeffect.com](mailto:admin@boogieeffect.com) quoting Date Privacy Enquiry.

## LIST OF COOKIES USED WITHIN OUR SITE

**NECESSARY COOKIES** - Necessary cookies help make a website usable by enabling basic functions like page navigation, security and access to secure areas of the website. The website cannot function properly without these cookies.

Name of Cookie	Purpose & Type	Provider	Expiry	Strictly Necessary
[SessionID#27]	Identifies user info in shopping bag	paypal	Session	yes
wc_cart_hash_#	Contains information about the cart as a whole and helps WooCommerce know when the cart data changes.	WooCommerce	Session	yes
wc_fragments_#	Contains information about the cart & helps WooCommerce know when cart data has changes	WooCommerce	Session	yes
jetpack_sso_nonce	Used for <a href="#">nonce</a> verification which help protect URLs and forms from certain types of misuse, malicious or otherwise	Jetpack	10 mins	yes
jetpack_sso_original_request	Stores the URL of the original login request.	Jetpack	1 hour	yes
wordpress_test_cookie	Checks if cookies are enabled to provide appropriate user experience.	Wordpress	session	yes
wordpress_logged_in	Checks whether the current visitor is a logged in WordPress.com user or not.	Wordpress	Session	yes
Simple_wp_membership_sec		Wordpress	session	yes
gdpr[allowed_cookies]	Remembers allowed cookie settings	GDPR WP	1 year	yes
gdpr[consent_types]	Remembers consent type settings	GDPR WP	1 year	yes
gdpr%Privacy_bar%5D	Used to gain initial privacy consent & settings	GDPR WP	1 year	yes

**STATISTICS COOKIES** - Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Name of Cookie	Purpose & Type	Provider	Expiry	Strictly Necessary
_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Google Analytics	2 year	no
_gat	Used by Google Analytics to throttle request rate	Google Analytics	Session	no
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	Google Analytics	Session	no
tk_lr	Collection of internal metrics for user activity, used to improve user experience.	WordPress	1 year	no
tk_or	Collection of internal metrics for user activity, used to improve user experience.	WordPress	5 years	no
tk_r3d	Collection of internal metrics for user activity, used to improve user experience.	WordPress	2 days	no
tk_rl	Collection of internal metrics for user activity, used to improve user experience.	WordPress	Session	no
tk_ai	Collection of internal metrics for user activity, used to improve user experience.	WordPress	5 years	no

tk_ro	Collection of internal metrics for user activity, used to improve user experience.	WordPress	Session	no
tk_tc	Collection of internal metrics for user activity, used to improve user experience.	WordPress	Session	no
vuid	Collects data on the use's visits to the website, such as pages have been read.	Vimeo	2 years	no
r/collect	Google advertising platform that analyzes browsing activity across website to establish user profile.	doubleclick.net	session	no
collect	Used to send data to Google Analytics about visitor behaviour & devices. Tracks the visitor across the devices and marketing channels.	Google analytics	session	no
PYPF	PayPal uses Cookies to recognise its customers and to shorten the time the user needs to log in to his PayPal account by checking his email on PayPal database.			

**THIRD PARTY COOKIES** – Some third party cookies are set by services that appear on our pages. They are set by the operators of that service and are not in our control. We invite the user to check the privacy policy and how to cancel the cookies set by these services at the addresses listed in the sections below. Third parties have full responsibility of the third parties cookie. Boogie Effect Ltd does not accept liability for the contents and cookies of external links, which can be changed without notice by the respective operators.

Name of Cookie	Purpose & Type	Provider	Expiry	Strictly Necessary
player, vuid, _abexps, auto_load_stats, clips, has_logged_in, has_seen_upgrade, site_settings, stats_end_date, stats_start_date, vimeo, vimeo_player, optimizelyBuckets, optimizelyEndUserId, optimizelySegments	Vimeo uses some cookies to check if users select some features or certain preferences. Find out more about each cookie used by Vimeo in their current cookie list.	Vimeo.com	Session	no
c_user, csm, fr, lu, p, pl, presence, s, xs, fbsr_xxx, fbm_xxxxx, _js_datr, locale, act, reg_ext_ref, reg_fb_gate, reg_fb_ref	Once you click on the Facebook share button, you will be asked to accept Facebook cookies. If you have a Facebook account, these cookies will allow you to share content from our website with your Facebook contacts	Facebook.com	Session	no
_twitter_sess, guest_id, ua, co, dnt, remember_checked_on	If you have a Twitter account, these cookies will allow you to share content from our website with your Twitter contacts.	Twitter	Session	no

If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to delete or block any cookies that are already on your machine (including Google Analytics cookie) please visit [AboutCookies.org](http://AboutCookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of this website.

To opt-out of third-parties collecting any data about your interaction on our website, please refer to their websites for further information.

If you have any questions, concerns, or comments about our privacy policy you may contact us using the information below Boogie Effect® Limited, Mounthoolie, Tynron, Thornhill, Dumfries & Galloway, DG3 4LE or email [admin@boogieeffect.com](mailto:admin@boogieeffect.com) quoting **Date Privacy Enquiry**.