

# GDPR Data Protection Policy

**Drums4Health**

Website: drums4health.com

**Effective Date:** 11 October 2025

**Last Updated:** 11 October 2025

## 1. Introduction

Drums4Health ("we", "us", or "our") is committed to protecting and respecting your privacy. This Data Protection Policy explains how we collect, use, and protect your personal data when you use our cardio drumming fitness services, visit our website, or interact with us.

We are the data controller for the personal data we process about you. This means we are responsible for deciding how and why your personal data is processed.

## 2. Information We Collect

### 2.1 Personal Data

We may collect and process the following categories of personal data:

**Identity Data:** Name, username, title, date of birth, gender

**Contact Data:** Billing address, delivery address, email address, telephone numbers

**Health Data:** Medical conditions, disabilities, fitness levels, mobility limitations, dietary requirements, emergency contact information, injury history, medication that may affect participation

**Technical Data:** Internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform

**Profile Data:** Username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses

**Usage Data:** Information about how you use our website, services and products

**Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences

### 2.2 Special Category Data

We process special category data (health data) which requires additional protection under GDPR. This includes:

- Medical conditions that may affect your ability to participate safely
- Physical limitations or disabilities

- Previous injuries relevant to exercise participation
- Emergency medical information

### 3. How We Collect Your Data

We collect personal data through:

- Direct interactions when you register for classes, complete forms, or contact us
- Automated technologies as you interact with our website
- Third parties such as payment providers
- Health screening forms and fitness assessments
- Emergency contact forms

### 4. Legal Basis for Processing

We process your personal data under the following legal bases:

**Consent:** For special category health data, direct marketing communications, and non-essential cookies

**Contract:** To provide our fitness services, process payments, and manage your bookings

**Legal Obligation:** To comply with health and safety requirements, accounting and tax obligations

**Legitimate Interests:** To improve our services, prevent fraud, and for administrative purposes (where not overridden by your interests)

**Vital Interests:** In emergency situations to protect your health and safety

### 5. How We Use Your Data

We use your personal data to:

- Provide cardio drumming classes and fitness services
- Ensure your safety during physical activities
- Process payments and manage bookings
- Communicate with you about classes, schedule changes, and services
- Respond to emergency situations
- Comply with legal and regulatory requirements
- Improve our services and develop new offerings
- Send marketing communications (with your consent)
- Provide customer support

## 5.1 Health Data Usage

We process your health data specifically to:

- Assess your suitability for our fitness programs
- Make reasonable adjustments for participants with disabilities
- Ensure appropriate supervision and safety measures
- Respond to medical emergencies
- Provide modified exercises where necessary

## 6. Data Sharing and Disclosure

We may share your personal data with:

**Service Providers:** Payment processors, IT support, booking systems, and other service providers who assist in delivering our services

**Emergency Services:** In case of medical emergencies during classes

**Legal Authorities:** When required by law or to protect our rights and safety

**Insurance Providers:** In case of incidents during classes (anonymized where possible)

We do not sell your personal data to third parties for marketing purposes.

## 7. International Transfers

If we transfer your personal data outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, including:

- Adequacy decisions by the European Commission
- Standard contractual clauses approved by the European Commission
- Binding corporate rules

## 8. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected:

- **Active participants:** Duration of membership plus 3 years
- **Health data:** 3 years after last class attendance
- **Financial records:** 7 years for tax and accounting purposes
- **Marketing data:** Until consent is withdrawn or 3 years of inactivity
- **CCTV footage:** 30 days (if applicable)

## 9. Your Rights Under GDPR

You have the following rights regarding your personal data:

**Right of Access:** Request copies of your personal data

**Right to Rectification:** Request correction of inaccurate personal data

**Right to Erasure:** Request deletion of your personal data in certain circumstances

**Right to Restrict Processing:** Request limitation of processing in certain circumstances

**Right to Data Portability:** Request transfer of your data in a structured, commonly used format

**Right to Object:** Object to processing based on legitimate interests or direct marketing

**Right to Withdraw Consent:** Withdraw consent for processing special category data or marketing communications

**Rights Related to Automated Decision Making:** Protection against solely automated decision-making

To exercise any of these rights, contact us using the details provided in Section 12.

## 10. Data Security

We implement appropriate technical and organizational measures to protect your personal data, including:

- Encryption of sensitive data
- Access controls and user authentication
- Regular security assessments
- Staff training on data protection
- Secure data storage and backup procedures
- Incident response procedures

## 11. Complaints

If you believe we have not handled your personal data in accordance with data protection law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

**Website:** [ico.org.uk](https://ico.org.uk)

**Phone:** 0303 123 1113

**Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 12. Contact Information

For any questions about this policy or your personal data, contact us:

### **Data Protection Officer**

Drums4Health

Email: [privacy@drums4health.com](mailto:privacy@drums4health.com)

Website: [drums4health.com](https://drums4health.com)

## 13. Changes to This Policy

We may update this Data Protection Policy from time to time. We will notify you of any significant changes by email or through our website. The "Last Updated" date at the top of this policy indicates when it was last revised.

## 14. Cookies

Our website uses cookies. For detailed information about the cookies we use and how to manage them, please refer to our Cookie Policy available on our website.

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**This policy was last updated on 11 October 2025.**