

Enchantica's Privacy Policy



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Introduction

Welcome to Enchantica's privacy policy. Where we refer to "we" we mean the Enchantica's group of companies (as set out below), and where we refer to "you" we mean the adult and/or the child under your control making use of our digital content, products and services where relevant.

Enchantica's respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you, the parent or guardian, information on how Enchantica's (Fantasy Kids Club Limited and others trading as "Enchanctica's") collects and processes both your personal data and that of your child through use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service, take part in a competition or as submitted by you or your child as part of any of our services generally.

The website and our services are primarily intended for children (via adult supervision and management) and do collect data relating to children as part of some of our services. We do our

best to minimise both the information we collect, and how long we keep it for, and we delete it as soon as possible unless we need to keep part of it strictly to comply with laws or insurance or other regulatory purposes.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Whilst we ask you, the adult, to consent to the processing set out in this policy, we ask that you take the time to explain how personal data is used to your child so that they can understand that their information is used by others to provide goods and services.

Controller

Enchantica's as is a trading name of our business which is made up of the following legal entities:

- **Fantasy Kids Clubs Ltd**, a company registered in England and Wales with company number: 07447529, ICO Registration Number: A8747994 and with its registered office at Unit 9 Unit 9, Beech Avenue Business Park, Beech Avenue, Harrogate, North Yorkshire, England, HG2 8DS; and
- **Make a Wish Entertainment Limited**, a company registered in England and Wales with company number 06906249, ICO Registration Number: Z2974594 and with its registered office at Unit 9, Beech Avenue Business Park, Beech Avenue, Harrogate, North Yorkshire, England, HG2 8DS.

The lead Data Controller is **Make a Wish Entertainment Limited**, and they are primarily legally responsible for processing your personal data on behalf of the Enchantica Group. If you have a complaint, they are the legal entity you should address it to.

This privacy policy is issued on behalf of the Enchantica's Group so when we mention Enchantica's, "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Enchantica's Group responsible for processing your data. Fantasy Kids Club Limited is the controller and responsible for this website.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entities: Fantasy Kids Clubs Limited and Make a Wish Entertainment Ltd

Email address: accounts@makeawishentertainment.co.uk

Postal address: Unit 9, Beech Avenue Business Park, Beech Avenue, Harrogate, North Yorkshire, England, HG2 8DS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 28 October 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes username or similar identifier, first name, middle name(s), last name, date of birth of the user, Town or region of residence, postcode, home address in some circumstances and potentially the same details of children under that user's control.
- **Contact Data** includes email address and telephone numbers and the same details of emergency contacts where applicable.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us and the last four digits of the card you paid with, along with the payment reference and in some cases, a contact email address.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Health Precaution Information:** This is a **special category** of personal data, meaning that it is assumed to be **sensitive/high risk** and includes details of any ailment or allergy or any other condition or sensitive personal information that you believe we should reasonably be made aware of in order to ensure your safety or that of any child under your care.
- **Usage Data** includes information about how users make use of our website, products and services generally. This might include heat maps, time spent on pages, number of clicks etc.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Free Text** – this could include any information whatsoever as we provide ways for you to write to us to tell us certain things like what you want for Christmas, what you've done well this year etc. We ask that you keep this information as generic as possible and try to avoid including too much personal data in order for you to protect your own privacy.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Special Categories of personal data

We try to avoid collecting Special Categories of Personal Data about you or your child as far as we are able to do so (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data) **except for the limited Health Precautionary Information as detailed above which we absolutely need**. We do not

collect any information about criminal convictions and offences. We ask that you limit the amount of this type of information that you provide to us, including in Free Text, in order to protect your privacy and that of your child.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

If you fail to provide accurate information, but we couldn't reasonably be expected to know whether or not the information you have provided is accurate or not, then we won't change it unless you tell us to. We might need you to provide this in order to pronounce a name properly, or detail a request for example.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - Health Precautionary Information for you or your children
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies[, server logs] and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.

Technical Data from the following parties:

analytics providers such as Google based outside the EU;

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe Inc,.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, except where that relates to Special Category data, and we will ask for your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us, though that wouldn't prejudice the validity of our processing before you withdrew consent.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Transactional (d) Technical (e) Profile (f) Marketing and Communications	Performance of a contract with you, including taking information from you with a view to entering into a contract.

<p>To process and deliver goods, services to you including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Sharing only the Personal Data required to process your payments with our secure payments processor</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>Forms you fill in, in order to tell us about requirements for Products</p>	<p>Free Text</p>	<p>Consent – your voluntary submission of free text forms.</p>
<p>Activities we do face to face or where they need to take into account risks specific to you or a class of people – christmas cards/notes from santa etc</p>	<p>Health Precautionary Information (such as allergies, ethnicity, medical health information etc).</p>	<p>Consent – where you are asked to complete a Health Precautionary Information form.</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Free Text</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical (d) Free text</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage (c) Free Text</p>	<p>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)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) Free Text</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you would like to change your preferences please email us on hello@enchanticas.com.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (where you haven't requested we do this specifically then we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We will only send you marketing about third party products and services where we consider it relevant or related to your interests which you've either expressed to us or that we can imply based on which of our own products and services you've used.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. For example, you can't unsubscribe from notices informing you that this policy has been updated.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO YOUR COOKIE POLICY\]](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties listed in the table in paragraph 4 above or the Specific Third Parties set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not currently transfer your personal data outside the European Economic Area (EEA) and the United Kingdom.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and insurance purposes.

Where we aren't required to keep your personal data for a longer period, we will delete it as soon as possible, sometimes after just one month where we don't think we'll need that information for any future purpose if we have already provided our services to you.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If we are busy, it could take up to three months (or longer in exceptional circumstances) to deal with your request, but we would tell you in the first month if this was the case.

10. **GLOSSARY**

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Data is shared between the companies who form part of the Enchantica group as described above.

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- **Stripe, Inc.** who are based in North America, and their associated group of companies, who act as a Processor (and in some instances, a separate Controller in relation to the data they collect directly from you) who manage payments you make to us and whose privacy policy is available at: <https://stripe.com/en-gb/privacy>
- **BookWhen Ltd** who are based in the UK who act as a Processor in order to process bookings for our events and sessions whose privacy policy is available at: <https://bookwhen.com/privacy> .

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.