



Cultura Kids Spanish - Privacy Notice for Customers, Employees, Workers and Volunteers

Last Updated: 23 June 2026

This Privacy Notice is published on the Cultura Kids Spanish website and is also available to parents, carers or those working with or for the company, upon request. Also available is the Cultura Kids Spanish Data Protection, Security and Privacy Policy.

What this Privacy Notice is for

This Privacy Notice is intended to provide information about how Cultura Kids Spanish will use (or “process”) personal data about individuals, including participants in our programmes, their parents and carers, and those working for or with the company. This information is provided because individuals have rights under UK data protection laws, including the UK GDPR and the Data Protection Act 2018, to understand how their personal data is used.

This notice is to be read alongside any other sources of information that Cultura Kids Spanish provides about using personal data (such as when submitting a registration form). This also applies in addition to any other applicable terms and conditions, policies or contracts between the company and parents and carers of participants, or those working for or with Cultura Kids Spanish.

Because we work with children, we take account of the need to protect children’s personal data and to provide privacy information in a way that is clear and appropriate for parents, carers and, where appropriate, children themselves.

Anyone acting on behalf of Cultura Kids Spanish (as an employee, volunteer, contractor or otherwise) should be aware of and comply with the Privacy Notice and the Data Protection, Security and Privacy Policy, as amended from time to time.

Our Responsibility for Data Protection

The Club Director is responsible for data protection matters and will deal with any enquiries about the use of personal data. The Club Director will endeavour to ensure that all personal data is processed in compliance with applicable UK data protection laws and that appropriate records, safeguards and procedures are maintained.

Why Cultura Kids Spanish Needs to Process Personal Data

To provide a service to our customers, Cultura Kids Spanish needs to process a variety of personal data about individuals, including those working for or with us, and past and present participants and their parents or carers. We only process personal data where we have a lawful basis for doing so. Depending on the circumstances, this may include performing a contract with you, complying with legal obligations, protecting vital interests, obtaining

consent, or pursuing our legitimate interests where these are not outweighed by the interests, rights and freedoms of the individuals concerned.

Cultura Kids Spanish considers the following as part of our legitimate business interests:

- to attract and admit new participants
- to support participant learning
- to monitor and report participant progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children, staff and volunteers safe (for example for safeguarding, food allergies, extra support or emergencies)
- to make use of photos or videos of participants on our website, social media and other marketing (where consent is given)
- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid

Sometimes Cultura Kids Spanish will also need to process special category personal data (for example information about health, ethnicity, religion, biometric data or other particularly sensitive information) or criminal records information. We will only do this where permitted by law, for example where it is necessary for safeguarding, health and safety, employment, legal or regulatory purposes, or where explicit consent is required and has been obtained. The reasons why we may need to do this include:

- to safeguard participants' welfare and provide the appropriate care and if needed, take appropriate action in the event of an incident, including disclosing an individual's medical information;
- to provide specialised tuition in the context of any special educational needs or learning difficulties;
- in connection with employment of staff, their welfare or pension plans; and
- for legal and regulatory purposes and to comply with any legal obligations or duties of care.

Types of Personal Data we Process

Some examples of the types of data we process are:

- names, addresses, phone numbers, email addresses and other contact details;
- dates of birth;
- language abilities;
- information about individuals' health, and contact details for their next of kin;
- background and experience documentation, including CVs, references and previous qualifications;
- images of staff or participants engaging in Cultura Kids Spanish activities, or for marketing purposes; and
- bank details and other financial information.
- technical information where individuals use our website or online services, such as device, browser, cookie or similar information, where applicable.

How Cultura Kids Spanish Collects Data

Cultura Kids Spanish usually receives personal data from the individual directly, or, in the case of participants, from their parents or carers. This could be via a paper or online form, through email, through social media or other electronic forms of communication, through our website or booking systems, or from staff, volunteers or third-party providers involved in supporting our programmes.

Who has Access to Personal Data

Personal information is managed by the Club Director and other senior members of the Cultura Kids Spanish team. Staff and volunteers will also indirectly have access to personal data by virtue of the fact that the information is necessary to safely and effectively run our programmes (for example by taking the register, accessing emergency contact details when needed, having regard to children's allergies and intolerances, and so forth).

On occasion, it may be necessary to share information with third parties, such as government authorities (for example HMRC, the police or the local authority), regulatory bodies, professional advisers, or similar.

We recognise that there are stricter rules in place for medical records and pastoral and safeguarding files. However, some information relating to safeguarding, medical, pastoral, SEN or a participant's learning difficulties may need to be provided to staff appropriately and to provide a quality service.

Parents and carers, participants and those working for or with Cultura Kids Spanish are reminded that we follow government guidance (including "Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings"), which may require us to record or report incidents and concerns that arise or are reported to us if they meet the threshold of seriousness in nature or regularity.

In accordance with data protection laws, some of our processing activities may be carried out on our behalf by third parties, such as web developers, booking or payment providers, payroll providers, IT support providers, email platforms, safeguarding advisers or cloud storage providers. Where required, we put appropriate contractual arrangements in place with those providers.

Where personal data is transferred outside the UK, we will take steps to ensure that the transfer is lawful and that appropriate safeguards are in place, such as relying on UK adequacy regulations, approved contractual safeguards or another lawful transfer mechanism.

How Long we Keep Personal Data

Cultura Kids Spanish will keep personal data securely and only for as long as is necessary for legitimate and lawful purposes. As a general guide, staff and participant records may be retained for up to 7 years following departure from our employment or programme, unless a longer or shorter period is required in the circumstances. Safeguarding, accident, complaint, employment, tax, insurance or other significant records may need to be retained for longer where this is necessary for legal, regulatory, safeguarding or insurance purposes.

We consider that good record keeping, appropriate storage and safe disposal form part of the effective management of our business and our compliance obligations. We will periodically review the personal data we hold and securely delete or anonymise it when it is no longer needed. If you have any questions about how our retention approach is applied, or wish to request that your data be considered for deletion, please contact the Club Director in writing.

Keeping in Touch

Cultura Kids Spanish will use the contact details provided by parents and carers to keep them updated about our programmes and important information for their child's participation. We may also communicate updates and information about upcoming events and programmes. Where communications amount to direct marketing, we will ensure that we have an appropriate lawful basis and will provide a clear way to opt out where required.

Individuals have the right to withdraw consent, where given, or to object to direct marketing and fundraising. Should you wish to object to any such use, please contact the Club Director in writing.

Your Rights

Who do rights belong to

The rights under the Data Protection laws belong to the individual to whom the data relates. However, Cultura Kids Spanish will usually rely on parental authority or notice for the ways it processes this data. This will be the case in particular because the age of the children we instruct will not be of sufficient maturity to make data-related decisions for themselves.

Right of Access

Individuals have rights under data protection laws to access and understand the personal data held by Cultura Kids Spanish. In some cases, and subject to certain exemptions and limitations, they also have the right to ask for it to be erased or corrected, to restrict or object to processing, to receive personal data in a portable format, or for Cultura Kids Spanish to stop processing it. Should you wish the use of your data to be altered in some way, please contact the Club Director in writing.

The right of access is limited to your own personal data and certain data may be exempt from the right of access. This may include data that identifies other individuals, safeguarding information, confidential references, legally privileged information, or information that is subject to other legal restrictions. Requests will be considered on a case-by-case basis and we may need to ask for information to confirm identity or clarify the request before responding.

Right to be Forgotten

There may be reasons you wish for your data to be deleted. However, this may be refused, for example, where there is a legitimate reason, such as a legal requirement or where it falls within a legitimate interest.

Where Cultura Kids Spanish Relies on Consent

There are some instances where Cultura Kids Spanish relies on consent. This consent can be withdrawn at any time, although withdrawing consent will not affect processing that has already taken place. Examples of where we may rely on consent include using you or your child's image for marketing purposes, optional mailing lists where you are not a customer, or other optional activities where consent is the appropriate lawful basis.

Where we ask for consent in relation to children's personal data, we will consider who is best placed to provide that consent, taking account of the child's age, understanding and the nature of the processing.

Data Accuracy and Security

Cultura Kids Spanish will work to ensure that all personal data held is as up to date and as accurate as possible. Individuals or their parents or carers and those working for or with Cultura Kids Spanish should ensure they keep us up to date as any information changes. Individuals have the right to request that any irrelevant or inaccurate information be erased and corrected (subject to certain exemptions under Data Protection laws).

We will take reasonable steps to protect personal data against unauthorised access, loss, misuse or disclosure, including through appropriate organisational and technical measures. If a personal data breach occurs, we will assess it promptly and take any notifications to individuals or the ICO that are required by law.

Queries and Complaints

Any comments or queries on this Privacy Notice should be directed to the Club Director using the email address info@culturakids.co.uk. If an individual believes that this policy has not been complied with, or that Cultura Kids Spanish has acted otherwise than in accordance with data protection law, they should notify the Club Director in the first instance. We will aim to consider and respond to complaints within a reasonable period. Individuals also have the right to lodge a complaint with the Information Commissioner's Office (the "ICO"). Please note that the ICO recommends that steps are taken to resolve the matter with the company before involving the regulator.