



Website Privacy Policy - KitchenJam

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1. Introduction.....	2
2. Information We Collect.....	2
2.1 Information You Provide to Us.....	2
2.2 Information Collected Automatically.....	2
2.3 Online Payments.....	3
3. How We Use Your Information.....	3
4. Cookies and Website Analytics.....	4
Metricool Website Analytics.....	4
5. Our Lawful Bases for Using Personal Information.....	4
6. Providing Your Information.....	5
7. Information About Children and Young People.....	5
8. Sharing Personal Information.....	6
9. International Transfers.....	6
10. Data Security.....	7
11. How Long We Keep Your Information.....	7
12. Your Data Protection Rights.....	7
Your Right to Object.....	8
13. Automated Decision-Making.....	8
14. Links to Other Websites.....	8
15. Changes to This Policy.....	8
16. Contact Information.....	9
17. Data Protection Complaints.....	9
18. Relevant Legislation and Guidance.....	9

1. Introduction

Guitar Tuition East London Ltd, trading as KitchenJam ("KitchenJam", "we", "our" or "us"), is committed to protecting your privacy and personal information.

This Website Privacy Policy explains how we collect, use, store and share personal information when you visit www.kitchenjam.com, contact us through the website or otherwise use our online services.

KitchenJam is the **data controller** for personal information where we determine how and why that information is used.

This policy has been prepared in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations 2003 (PECR) and other applicable data protection and privacy legislation.

2. Information We Collect

The information we collect depends on how you use our website.

2.1 Information You Provide to Us

This may include:

- your name;
- email address and telephone number;
- information about a potential student, including their name and age;
- parent or carer details;
- preferred lesson location;
- information about musical experience, interests or goals;
- enquiry comments or questions;
- booking or membership information;
- information you provide when using any online account features;
- correspondence you send to us; and
- any other information you choose to provide through our website.

If you provide information about another person, such as your child, we will also process their personal information in accordance with this policy.

Please avoid including sensitive personal information in free-text fields unless it is relevant to your enquiry. Where you provide information relating to health, disability, safeguarding or another type of special category data, we will only process it where there is an appropriate lawful basis and additional legal condition for doing so.

2.2 Information Collected Automatically

When you use our website, we or our service providers may automatically receive information such as:

- IP address;
- browser and device information;
- operating system;
- pages viewed;
- dates and times of visits;
- referral information;
- approximate geographic information; and
- information about how visitors navigate and interact with the website.

Some of this information is collected automatically as part of providing the website or through website analytics and similar technologies, as explained in Section 4.

2.3 Online Payments

Where payments are made through our website or an external payment service, payment information may be processed directly by the relevant payment provider.

KitchenJam may receive information about the transaction, such as the amount, date, payment status and customer details, without receiving or storing full payment card information.

3. How We Use Your Information

We may use personal information to:

- respond to enquiries and follow them up;
- discuss suitable lessons, classes, workshops or other services;
- arrange trial sessions, bookings and memberships;
- provide and administer our services;
- manage online account features where applicable;
- communicate with students, parents, carers and customers;
- process and maintain transaction and payment records;
- provide appropriate support or adjustments;
- manage and improve our website;
- understand how visitors use our website;
- maintain the security and integrity of our website and systems;
- prevent fraud, misuse or other unlawful activity;
- meet safeguarding responsibilities;
- deal with complaints, disputes or legal claims;
- meet legal, regulatory, tax and accounting obligations; and
- send marketing communications where permitted by law.

Submitting an enquiry does not automatically sign you up to receive unrelated marketing communications.

Where we send direct marketing, we will only do so where permitted by data protection and electronic marketing law. Where consent is required, we will ask for it separately. You can opt out of marketing at any time by using an unsubscribe option where provided or by contacting us.

4. Cookies and Website Analytics

Our website may use cookies or similar technologies that are necessary for the website to function, remain secure or provide features requested by visitors. These types of technologies do not require consent where the relevant legal exception applies.

Metricool Website Analytics

KitchenJam uses **Metricool** to understand how our website is being used.

Metricool provides us with aggregated information about website use, including information such as:

- the number of visits;
- pages viewed;
- how visitors reached the website; and
- approximate geographic information such as country.

Metricool's website visit tracker does **not use cookies**, does not store information on a visitor's device and does not assign a unique identifier to individual visitors. A visitor's IP address is used during the connection to determine information such as country, but Metricool states that the IP address is not stored.

We use this information to understand website traffic and improve the content and performance of our website. We do not use Metricool's website tracker to identify individual visitors.

KitchenJam does not currently use a cookie consent banner because we do not intentionally use non-essential cookies or similar technologies that require consent.

If we introduce technologies in future that require consent under PECR, such as certain advertising or tracking technologies, we will obtain the appropriate consent before using them.

You can also control or delete cookies through your browser settings. Blocking essential cookies or technologies may affect how some parts of the website work.

5. Our Lawful Bases for Using Personal Information

We will only use personal information where we have an appropriate lawful basis.

Depending on what we are doing, these may include:

- **Contract:** where processing is necessary to take steps at your request before entering into a contract, to provide services you have agreed to receive or to meet obligations under a contract with you.
- **Legal obligation:** where we need to process information to comply with the law.
- **Legitimate interests:** where processing is necessary for our legitimate interests or those of another organisation, provided those interests are not overridden by your rights and freedoms. This may include responding to enquiries, operating and

improving our website, maintaining records, securing our systems and managing our business.

- **Consent:** where you have freely chosen to give consent for a particular use of your information.
- **Vital interests:** where processing is necessary to protect someone's life.
- **Recognised legitimate interest:** where processing is necessary for one of the recognised purposes set out in UK data protection law, including certain safeguarding, emergency and crime-prevention purposes.
- other lawful bases permitted under UK data protection law where applicable.

Where we process special category information, we will also identify an additional legal condition permitting that processing.

6. Providing Your Information

You do not need to provide personal information simply to browse most areas of our website.

However, certain information may be necessary if you want to:

- submit an enquiry;
- receive a response from us;
- use an online account feature;
- make a booking or payment; or
- use certain other website services.

If required information is not provided, we may not be able to respond to your enquiry or provide the requested service.

7. Information About Children and Young People

KitchenJam provides services for children and young people, and we recognise that children may access our website.

Information about younger children will normally be provided by a parent or carer, for example when making an enquiry or arranging lessons. Young people may also contact KitchenJam themselves where appropriate.

We will take particular care when processing children's personal information and will:

- collect only information that is reasonably necessary;
- take account of the child's age, understanding and best interests;
- use clear and appropriate information about how their data is used;
- protect children's privacy when designing and operating online services; and
- take particular care when sharing children's information.

A child's data protection rights belong to the child. Where a parent or carer acts on behalf of a child in relation to their personal information, KitchenJam will take account of the child's age and understanding, their best interests and whether the person making the request has appropriate authority.

Where we rely on consent to provide an online service directly to a child under 13 and UK data protection law requires parental authorisation, we will obtain the appropriate authorisation.

Where the Information Commissioner's Children's Code applies to an online service we provide, we will take account of its requirements.

If information provided through the website raises a safeguarding concern, we may use or share that information without consent where it is lawful and necessary to protect a child or another person. Safeguarding concerns will be handled in accordance with our Safeguarding Policy.

8. Sharing Personal Information

We may share personal information with organisations that help us operate our website or provide our services where this is necessary and appropriate.

These may include:

- website hosting and platform providers;
- online form and communication providers;
- booking and membership systems;
- payment providers;
- email and cloud service providers;
- website analytics providers, including Metricool;
- IT and technical support providers;
- accountants, insurers and professional advisers;
- event or venue partners where necessary;
- local authorities, safeguarding agencies or police where appropriate; and
- other organisations where disclosure is required or permitted by law.

Access within KitchenJam is limited to people who need the information for their work.

We do not sell personal information.

Where another organisation processes personal information on our behalf, we will take reasonable steps to ensure appropriate data protection arrangements are in place.

9. International Transfers

Some companies that provide website, cloud, payment, analytics or other digital services to KitchenJam may process personal information outside the UK.

Where personal information is transferred internationally, KitchenJam will ensure that an appropriate mechanism is used where required under UK data protection law. This may include UK adequacy regulations or other appropriate safeguards and any required data protection test.

10. Data Security

KitchenJam uses appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, destruction, alteration, disclosure or access.

Depending on the information and systems involved, measures may include:

- secure passwords and authentication;
- appropriate access controls;
- secure website and cloud services;
- restricting access according to role and need;
- appropriate backup arrangements;
- secure sharing methods; and
- secure deletion or disposal procedures.

No online service can guarantee absolute security, but we take reasonable and proportionate steps to protect the information we hold.

11. How Long We Keep Your Information

We will not keep personal information for longer than it is reasonably needed.

As a general guide:

- enquiry information that does not result in an ongoing relationship will normally be retained for up to **12 months after the last meaningful interaction**;
- where an enquiry results in lessons, a booking or membership, relevant information may become part of the student or customer record;
- core contractual, transaction and financial records may normally be retained for up to **six years after the relevant relationship ends**, where appropriate for legal, accounting or administrative purposes;
- online account information will normally be retained while the account remains active and for an appropriate period afterwards;
- information relating to safeguarding may need to be retained for longer in accordance with our Safeguarding Policy and applicable safeguarding requirements; and
- website analytics information will be retained only for as long as reasonably necessary for the relevant purpose and in accordance with the settings and retention arrangements of the relevant provider.

When information is no longer required, it will be securely deleted, destroyed or anonymised as appropriate.

12. Your Data Protection Rights

Depending on the circumstances and the lawful basis we rely on, you may have rights including:

- the **right to be informed** about how your information is used;

- the **right of access** to personal information held about you;
- the **right to rectification** of inaccurate or incomplete information;
- the **right to erasure** in certain circumstances;
- the **right to restrict processing** in certain circumstances;
- the **right to data portability** in certain circumstances;
- the **right to object** to certain uses of your information; and
- rights relating to certain forms of automated decision-making.

These rights are not absolute and do not all apply in every situation.

You can make a request verbally or in writing using the contact details in Section 16. We will normally respond without undue delay and within one month, subject to any extension or other provision permitted by law.

Your Right to Object

You have the right to object to certain processing based on legitimate interests or recognised legitimate interests.

You also have an **absolute right to object to the use of your personal information for direct marketing**. If you ask us to stop using your information for direct marketing, we will do so.

Where we rely on consent, you can withdraw that consent at any time. This will not affect processing that took place before consent was withdrawn.

13. Automated Decision-Making

KitchenJam does not currently use personal information collected through the website to make decisions based solely on automated processing that produce legal or similarly significant effects on individuals.

If this changes, we will provide the information required by data protection law.

14. Links to Other Websites

Our website may contain links to websites operated by other organisations.

KitchenJam is not responsible for the privacy practices of websites operated by third parties. When you leave our website, you should check the privacy information provided by the organisation operating the other website.

15. Changes to This Policy

We may update this Website Privacy Policy from time to time to reflect changes in the law, our website, our services or the way we use personal information.

The current version and date of review will be published on our website.

Where a change materially affects how we use personal information, we will take reasonable steps to bring the change to the attention of affected individuals where appropriate.

16. Contact Information

For questions, requests or complaints relating to personal information, please contact:

Data Protection Lead: Darryl Powis

Email: darryl@kitchenjam.com

Address: KitchenJam, 8-10 Penny Brookes Street, London, E20 1BN

17. Data Protection Complaints

If you are concerned about how KitchenJam has collected or used your personal information, you can raise a data protection complaint using the contact details above.

KitchenJam will:

- provide a clear way for you to make a complaint;
- acknowledge receipt of the complaint within **30 days**;
- make appropriate enquiries and investigate the complaint without undue delay;
- keep you appropriately informed of progress; and
- explain the outcome without undue delay.

You also have the right to complain to the **Information Commissioner's Office (ICO)**.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

18. Relevant Legislation and Guidance

This policy has been prepared with regard to:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Data (Use and Access) Act 2025;
- Privacy and Electronic Communications Regulations 2003 (PECR);
- the Information Commissioner's Children's Code, where applicable; and
- relevant Information Commissioner's Office guidance.