Adventure Days UK Data Protection Policy

Data Controller and processor:
David Whiteley
44 Bants Lane, Northampton, NN6 5AL
07914529270

Purposes of processing

Adventure Days UK collects and processes personal data in order to provide a service for customers. The categories of data subjects and personal data processed are outlined below.

Adventure Days UK operates under the lawful basis of contract and of consent. This means that the data is required by us either in order to fulfil a contract with an individual, or the individual has given explicit consent for us to process their data.

<u>Lawful basis – contract</u>

Information that is gathered in order to fulfil a contract with the customer or to provide information prior to the customer entering into a contract with us is processed under the lawful basis of contract. The reason for this is that we cannot provide our services to you without this information. Adventure Days UK seeks to minimise the amount of personal data held and therefore we will only ask you for information that is necessary to fulfil this purpose.

<u>Lawful basis – consent</u>

In addition to information gathered under the lawful basis of contract Adventure Days UK may ask for your permission to use your contact details for marketing and advertising purposes and to use your image/video in advertising and marketing. We will never do this without your consent. It is not necessary to consent to the use of contact details, image or video for advertising and marketing purposes in order to receive services from Adventure Days UK and your consent may be withdrawn at any time without affecting your contract or eligibility to receive services from us. For full information please see our marketing policy.

Categories of data subjects

Information will be held on the following data subjects:

Customers and prospective customers of Adventure Days UK – Data will be held for the purposes of fulfilling our contract with customers, or to provide information or a quotation for a potential customer.

Children who participate in a Duke of Edinburgh Expedition run or assessed by Adventure Days UK – Data will be held for the purposes of running a safe and appropriate expedition. The data will be collected from the participants' school or parent.

Freelance Instructors – Data will be held for the purposes of hiring and payment of freelance instructors.

All data subjects have the right to request access to and rectification or erasure of personal data from the data controller named at the beginning of this document. All data subjects have the right to data portability, and to request the restriction, or to object to, processing of their data. In addition, all data subjects have the right to lodge a complaint with the Information Commissioner's Office.

Envisaged time limits for erasure of different categories of data

Adventure Days UK seeks not to retain information for longer than necessary and appropriate. Once the information is no longer necessary it will be deleted. The envisaged timescales for erasure of data can be found in the table below.

Personal data held by Adventure Days UK

The table below outlines the categories of personal data held by Adventure Days UK, the legal basis for processing this data and envisaged timescales for erasure of this data.

| Data held | Legal basis for processing this | Envisaged timescale |
|---------------|---------------------------------|---|
| | data | for erasure of this data |
| Name | Contract | 1 year following |
| | If given for | completion of the |
| | marketing/advertising purposes | contract/service, to |
| | then consent | allow Adventure Days |
| | | UK to respond to any |
| | | queries or complaints |
| | | from the customer |
| Date of birth | Contract | If given for marketing/advertising purposes this information will be retained in our subscriber list until the individual unsubscribes. Erased within 1 week of completing the |
| | | contract |
| Address | Contract | 1 year following |
| | | completion of the |
| | | contract/service, to |
| | | allow Adventure Days |
| | | UK to respond to any |
| | | queries or complaints |
| | | from the customer |

| Contract | 1 year following |
|--------------|---|
| | 1 year following |
| - | completion of the |
| | contract/service, to |
| then consent | allow Adventure Days |
| | UK to respond to any |
| | queries or complaints |
| | from the customer |
| | |
| | If given for |
| | marketing/advertising |
| | purposes this |
| | information will be |
| | retained in our |
| | subscriber list until the |
| | individual |
| | unsubscribes or the |
| | email address is no |
| | longer valid (delivery |
| | failure). |
| Contract | 1 year following |
| | completion of the |
| | contract/service, to |
| | allow Adventure Days |
| | UK to respond to any |
| | queries or complaints |
| | from the customer |
| Contract | Erased within one |
| Contract | week of completing the |
| | contract |
| Contract | Erased within one |
| Contract | week of completing the |
| | contract |
| Contract | Erased within one |
| Contract | |
| | week of completing the |
| Contract | contract Erased within one |
| Contract | |
| | week of completing the |
| | contract |
| Contract | Erased within one |
| | week of completing the |
| | contract |
| Consent | Images and videos for |
| | marketing or |
| | advertising purposes |
| | will be kept until the |
| | data subject removes |
| | their consent or the |
| | Contract If given for marketing/advertising purposes then consent Contract Contract Contract Contract Contract Contract Contract Contract |

| | T | |
|--|----------|------------------------|
| | | images or videos are |
| | | no longer relevant to |
| | | services provided by |
| | | Adventure Days UK |
| Mountain Training candidate | Contract | 1 year following |
| number | | completion of the |
| | | couse, to allow |
| | | Adventure Days UK to |
| | | complete relevant |
| | | course reports and |
| | | allow Adventure Days |
| | | UK to respond to any |
| | | queries |
| Duke of Edinburgh's Award | Contract | 1 year following |
| participant number | | completion of the |
| | | expedition to allow |
| | | Adventure Days UK to |
| | | respond to any queries |
| | | regarding the |
| | | expedition |
| Copy of relevant documents | Contract | 3 years from the last |
| e.g. instructor qualifications, | | date the instructor |
| first aid certificates and | | completed work for |
| insurance details | | Adventure Days UK, in |
| | | case of complaints or |
| | | legal action |
| Copy of DBS certificate for | Contract | 3 years from the last |
| instructors | | date the instructor |
| | | completed work for |
| | | Adventure Days UK, in |
| | | case of complaints or |
| | | legal action |
| Sort code and account | Contract | 1 year from the last |
| number for payment of | Contract | date the instructor |
| instructors | | submitted an invoice, |
| mistractors | | in case of queries |
| | | regarding payment |
| Accident/incident report | Contract | 3 years following the |
| including name, address, date | Contract | accident/incident in |
| _ | | · · |
| of birth, phone number, details of the incident or | | case of legal action |
| | | |
| accident and any first aid | | |
| administered | | |

Categories of recipients to whom personal data will be disclosed

Adventure Days UK uses a third party 'Wix.com Ltd.' to manage its website, including mailing list and online shop. 'Wix.com Ltd.' is certified under the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework regarding the collection, use and retention of information transferred from the EU and Switzerland to the United States.

Adventure Days UK will disclose personal data to the emergency services, in the event of an emergency whilst the individual is taking part in an activity with Adventure Days UK and the individual is unable to provide the information to the emergency services themselves.

Security

Information is stored in both paper and electronic form. Electronic information may be stored and processed on laptop computers/PCs or mobile phones. All electronic information stored will be encrypted so as to protect it in the event of a data loss or breach. Information processed through the website adventuredaysuk.com will be processed by 'Wix.com Ltd.' and may be transferred to the US on the basis of EU/US Privacy Shield programme (see above 'Categories of recipients to whom personal data will be disclosed' for further information). Information stored in paper format will be locked away securely when not in use, to prevent unauthorised access to the data. In the event of Adventure Days UK implementing any new technology which may put data at risk a Data Privacy Impact Assessment will be carried out, and this policy and security measures updated accordingly.

Cookies

Our website (www.adventuredaysuk.com) uses cookies for security and to track an individual's visits to the page, including storing information about items added to the cart. Cookies may be deleted however please be aware this may affect the functionality of the website. To find out more about cookies and how to manage/delete them please visit www.aboutcookies.org