

**Privacy Policy for:**

## **Derwent Adventure Education**

**including the trading names:**

**Rock Climbing Peak District, Abseiling Derbyshire, Moorlands Bushcraft & Archery Events**

**Registered address:**

**Rose Cottage Farm, 67 Brookfields Road, Ipstones, Staffordshire, ST10 2LY**

This Policy sets out how we collect, store and use information when an individual or organisation contacts us via email, post or via our website and how we store personal data when working for third parties.

We have included changes to address the new standards introduced by the European data protection law known as the General Data Protection Regulation (GDPR). GDPR builds on previous legislation (Data Protection Act of 1988) to provide more protection to individuals' data and privacy and to apply obligations on organisations to handle personal data appropriately.

Our policy demonstrates how we comply with the following legislation and are taking practical steps to comply with GDPR (2016/679) and DPA 2018:

**DPA 2018:** Data Protection Act 2018

**GDPR:** the General Data Protection Regulation (Regulation (EU) 2016/679)

**LED:** Law Enforcement Directive (Directive (EU) 2016/680)

### **Information we assess:**

#### **1 Websites**

We maintain four websites and assess Information collated by a third party, about how individuals use our websites (e.g. which pages have been viewed, the time when they were viewed and what was clicked on, the geographical location from which our website was accessed based on the IP address), company name or business name (if applicable). We use a third party server to host our website. Our website server automatically logs the IP address used to access our website as well as other information such as the pages accessed, information requested, the date and time of the request, the source to our website (e.g. the website or URL (link) and browser version and operating system.

Our third party hosting provider stores server logs to ensure network and IT security and so that the server and website remain uncompromised.

Use of cookies: we use cookies on our website including essential, functional and analytical cookies.

How we use personal information:

- To analyse use of our website, and in connection with our legal rights and obligations.
- To respond to emails generated via third parties, including affiliates and professional institutes.
- We do not sell information to third parties or share personal data / information with third parties.
- The Company only hold personal data for as long as it is legally needed, and it is held securely and confidentially, using secure IT and storage systems.

**2. Email**

When we receive an email in response to the contact form displayed on our website, we collect that email address and any other information provided to us in that email (such as name, telephone number and the information contained in any signature block).

Our legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Our emails are sent via our webhost provider – Zen Internet Ltd. based in the UK. Our emails are sent via Gmail.

**3. Phone**

When we are contacted by phone, we collect the phone number and any information provided to us during a conversation with us. We do not record phone calls.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

#### **4. How long we retain personal information**

We obtain personal information when clients book a course or engage us to deliver an experience. We retain personal information only to meet our legal obligations (e.g. for financial records or in the event of an insurance claim).

We do not generate emails or make further contact with any individuals who have had an 'experience' with us and we do not mailshot our clients.

We retain personal information for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using personal information (e.g. performance of a contract or our legitimate interests as a business).

We do not transfer personal information outside of the European Economic Area.

#### **5. Sensitive Personal Information**

We will very occasionally hold 'sensitive personal information'. The sorts of circumstances when we require sensitive personal information include: dietary requirements and allergies, known health risks, disabilities, medical declarations, DBS forms. Group organisers are required to collate and declare any medical issues.

Any 'sensitive personal information' we receive will be securely stored and destroyed once a contract or experience has been delivered or at the end of the legal time requirement to store. None is stored on electronic equipment and all hard 'sensitive personal information' is shredded.

#### **6. Independent contractors**

We occasionally use independent contractors and freelancers in our business. Personal information, such as names, addresses and telephone numbers, will be shared with independent contractors and freelancers (a sub-processor) only where it is necessary for them to perform the function we have hired them to perform in relation to our business and in that instance that they have measures in place to comply with the GDPR (2016/679) and DPA 2018. All practical and reasonable steps are taken to ensure that sub-contractors and freelancers, short term or voluntary staff do not have access to any personal data beyond what is essential for the work to be carried out properly. Confidentiality clauses will be put in place when working with any sub-contractors and freelancers who may need to access 'sensitive personal information' in order to fulfil their contract. For further detail see our Information Security Policy.

Our independent contractors and freelancers are located in the United Kingdom.

## **7. Specific retention periods**

Order information: when an order is placed for services, we retain that information for a minimum period of six years following the end of the financial year in which the order was placed, in accordance with our legal obligation to keep records for tax purposes under paragraph 6, Schedule 11 of the Value Added Tax Act 1994.

Correspondence and enquiries: when an enquiry or contact is made by email, we will retain personal information for as long as it takes to respond to and resolve the enquiry, and for 6 further month(s), after which point we will delete personal information and remove it from our email server.

## **8. Transmission of information to use by email**

Transmission of information over the internet is not entirely secure, and if any information is submitted to us over the internet (whether by email or by cloud storage), it is done at the risk of that company or individual.

## **9. Rights in relation to information**

Individuals or companies have the following rights in relation to personal information supplied to us by any of the above means, which can be exercised by writing to Peter March, Rose Cottage Farm, 67 Brookfields Road, Ipstones, Staffordshire, ST10 2LY, or sending an email to [pete@derwentadventureeducation.co.uk](mailto:pete@derwentadventureeducation.co.uk)

- to object to the use of their personal information
- to request access to their personal information and information related to our use and processing of that personal information;
- to request the correction or deletion of their personal information;
- to request that we restrict our use of their personal information;
- to withdraw consent to our use of their personal information at any time where we rely on consent to use or process that information.
- to complain to a supervisory authority

## **10. Data Breaches**

Appropriate procedures will be put in place to comply with GDPR (2016/679) and DPA 2018 to ensure personal data breaches are detected.

Appropriate mechanisms will be put in place to include mandatory obligations for any future data processing contracts.

Derwent Adventure Education  
May 2018