

## **12. High Adventure General Data Protection Regulation (GDPR) Policy.**



### **Overview**

As of 25<sup>th</sup> May 2018, a new data protection law was introduced in the UK, Article 15. In this document is all you need to know about how and why High Adventure process your personal data, how we keep your personal data secure and what your now enhanced rights are in relation to your personal data. Please do make sure you take the time to read this document carefully so that you are fully informed of the new regulations and what High Adventure is doing about them.

### **Definitions**

Here are some important definitions relating to the new data protection law:

GDPR – General Data Protection Regulation (the new legislation which came into effect in May 2018) Data Protection – The process of protecting personal data from unauthorised or unlawful disclosure, access, alteration, processing, transfer or deletion

Personal Data – Any information relating to an individual. For example: D.O.B., Medical, Address, etc..

Business Data – Any information relating to business to business communications. For example: School address, Head Teacher, contact details, etc..

Identifiable Natural Person – A living individual who can be identified from one or more pieces of data which is in possession of the data controller, is likely to come into the possession of the data controller or could be obtained by without too much effort

Data Controller – An organisation or individual which is responsible for determining the purposes and means of processing personal data

Data Processor – An organisation or individual which processes data on behalf of a data controller

Data Subject – The natural person to whom the data relates

Supervisory Authority – The Information Commissioner's Office (ICO) is the data protection supervisory authority in the UK

Consent – Any freely given, specific, informed and unambiguous indication that the data subject agrees to the processing of his or her personal data by means of clear, affirmative action

Subject Access Request – Request to access personal data held by data controller if the data subject has any doubts concerning the accuracy or lawfulness of the processing of that personal data

### **Consent**

Due to the changes in regulations regarding consent, we now need clear, affirmative action from you to confirm that you would like to continue receiving communications from us. We consider making a booking with High Adventure as clear, affirmative action confirming you wish to communicate with High Adventure. If you book any of our services you will receive information about your booking and about future booking opportunities. If you would no longer like to receive this communication, please email to confirm in writing that you do not wish to be contacted.

Email: [info@highadventureoec.co.uk](mailto:info@highadventureoec.co.uk)

### **Data Processing**

Business to business (HA to schools, PRU, groups, etc.): High Adventure will ensure that all business data is processed lawfully, fairly and in a transparent manner. Any data will not be shared with any third parties. Business data will only be kept if it is relevant to our business, such as; advertising products relevant to the business being contacted, sending out relevant updates, information about upcoming events and direct marketing campaigns. This means that only data which is relevant for these purposes

will be processed.

Business to general public and young people: High Adventure will ensure that any personal data is processed lawfully, fairly and in a transparent manner. Any data will not be shared with any third parties. Any personal data of any young people under the age of 16 will be kept until their 16<sup>th</sup> year or until requested to be removed, whichever comes first, with the exception on any data relating to near misses/accidents/incidents. Data relating to near misses/accidents/incidents items will be kept until the young person's 21<sup>st</sup> year.

Any personal data of the general public (persons over 16) who have contacted or visited High Adventure will be kept for marketing and re-booking processes if on the booking form.

If this is not agreed to, the data will only be held for the relevant time for the booking and follow up for feedback and re-booking.



### **Data Security**

High Adventure will do everything in our power to ensure that personal data is appropriately secure and protected from unauthorised or unlawful processing, and against accidental loss, damage or deletion. Your personal data is stored on a password protected database which will only be accessible by the centre management, centre administrators and finance officer. This database is also backed up on another password protected external hard drive which is encrypted and requires our IT support to allow access.

Accident, near miss and incident forms: Once processed will be stored initially in a locked cupboard which only centre management, centre administrators and finance officer will have access to. Given that this information may be required up to 3 years after a participant turns 18, the forms will be removed from the office and locked into a secure archive cupboard. When the participant turns 21 the form will be destroyed.

Group details forms: Medical and dietary details are required for the safe running of our programmes. These details are put in the Advanced Staffing Folder which is kept in the locked office. The course director will collect this information at the start of programmes and share the details with the instructors on the programme and the domestic team. All HA staff can have access to this data if it relates to the safe running of activities or it aids in the care of participants.

The course director will keep these records secure by storing them in the office when not needed and destroying them after the group has departed.

The office admin team will check the departed and medical tray weekly to ensure that any medical details no longer needed are destroyed.

Any electronic versions of the Group Details sent to High Adventure via email will be deleted after the trip. At the start of every year a check of the last 12 months emails will be carried out to check that all group details forms have been deleted.

Booking forms: Booking forms will be kept electronically or paper copies, for 2 years after the visit. In the 2<sup>nd</sup> year the booking forms will be deleted or destroyed. At the start of every calendar the admin team will do a clear out of all booking forms in their 2<sup>nd</sup> year.

We will continue to review and upgrade our security measures in accordance with technological development and changes to recommendations/guidance from government. The management team will do a yearly check each August of procedures to ensure that the policies are being followed.

### **Transfer of Data to Third Parties**

High Adventure will never pass your personal data on to any third party except in the case of medical emergency when under the supervision of High Adventure staff, when we may need to pass information from your medical form on to a medical professional to aid your care. Medical forms will be destroyed after staying at High Adventure, unless there has been a reportable accident, in which case medical forms may again have to be passed on to the relevant authorities and then archived..

### **Subject access requests**

Following any **subject access request by an appropriate person who's identity has been established** by High Adventure admin staff or management, High Adventure shall provide, without

charge and without undue delay, the following: confirmation that personal data is being processed, a copy of the personal data that is being processed, confirmation of deleted/destroyed data, and all information essentially equivalent to our Privacy Policy.

For further copies, or if the request is manifestly unfounded or excessive, a reasonable fee may be charged to cover administrative costs.

When the subject access request is made electronically, this information will be provided in a commonly used electronic format, unless otherwise requested by the data subject.

**ALL requests relating to date must be made in writing.**

Please email any requests in writing to;

Email: [info@highadventureoec.co.uk](mailto:info@highadventureoec.co.uk)

**High Adventure data controller**

The data controller is, in the first instance, the Centre Administration Team and Centre Management. They can be contacted using the following:

**Telephone:** 01535630044

**Email:** [info@highadventureoec.co.uk](mailto:info@highadventureoec.co.uk)

**Postal:** High Adventure Outdoor Education Centre Ltd,  
233 Keighley Road  
Cowling  
North Yorkshire, BD220AA

