



## Privacy Statement

**High Points** is committed to protecting your privacy and security. This policy sets out how we collect and process personal data which we collect from you or which you provide to us. These are the data that you enter when you make an enquiry on our website, and information collected by us as you interact with our services. Whenever you provide personal information, we will treat that information in accordance with this policy, with current legislation on protection and use of data.

### Who are we - who holds your data?

We are **High Points Outdoor Education and Training Ltd.**, Registered Company Number **14005717**, in the UK. Our Data Controller is our Company Director, Tim Deighton. This data privacy statement applies to us and our activities in the UK and abroad.

### 2. What data do we collect and how?

We collect the following categories of data about you:

i. Name and Contact Details

The information you provide when booking an expedition or programme, or if you work as a self-employed contractor for us. e.g. your given names and surname, date of birth, address, your telephone number and email address.

ii. Personal / Sensitive Data

For certain aspects of our work we are required to record personal / sensitive data, e.g. driving licence number.

iii. Financial Information

- Payment information such as bank account details

iv. Photographs

We will not take photographs unless by previous agreement with the client. If you allow us to use photographs you have taken, we may store your name and the fact that you have given us permission to use them. If you are pictured in a photograph we have taken, and given us permission to use it, we will record this.

v. Accidents or Incidents



If an accident or incident occurs at our registered office, on one of our expeditions or programmes, or involving one of our staff then we'll keep a record of this (which may include personal data and sensitive personal data, such as information relating to health).

### **3. How do we use your personal data?**

We may process your personal information for carefully considered and specific purposes which are permitted by regulations and enable us to carry out our services. **High Points** will use your data for the following purposes:

1. To answer an enquiry
2. For the supply of the service you have requested
3. For maintaining contact with you
4. Improving the services we provide
5. Processing any payments due to you, or handling any contract we have entered into with you
6. For our administration and for compliance with legislation and regulations.

We will always comply with the law.

### **4. Who has access to your data?**

We may disclose your personal information to any of our employees, contractors, agents, partners or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy. In addition, we may disclose your personal information:

- a. to the extent that we are required to do so by law;
- b. in connection with any ongoing or prospective legal proceedings;
- c. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- d. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- e. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.



#### 4. Which third parties have access to your data?

We will only share your data with partners and service providers who are directly involved in your booking / programme, for example the Duke of Edinburgh's Award, sub-contractor delivering your programme.

#### 5. How do we secure your data and how long do we retain them?

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Client information is collated and stored in Google Drive requiring two factor authentication to access.

It is the client's responsibility to ensure **High Points** is made aware of any issue which may affect the health and safety of any attending pupil and/or member of staff. The client is responsible for gathering/ keeping/ ensuring access to a list of the attending pupils.

On occasion, personal information is printed and given to **High Points** staff for the purpose of an event / programme. Following the finish of the event / programme this data is disposed of or returned to school staff.

All electronic transactions entered into via the website will be protected by encryption technology. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We retain your data as long as required to realise the objectives as described in this privacy statement, but generally no longer than 2 years\* after your last interaction with us, unless in so far as such is necessary for compliance with our statutory obligations, or for the benefit of potential disputes. If we no longer require data then we destroy these data or anonymise them in order that they can no longer be linked to you.

\*Accident Records: will be kept for a minimum of 3 years and 4 months, or if it involves a child until they reach 21 years and four months.

#### 6. Your Preferences

By providing personal data you consent to its processing as described in this Policy. <sup>[L]</sup><sub>[SEP]</sub> If you do not wish to receive information in any or all of following ways - mail, telephone, e- mail, SMS – or wish to express other preferences, contact: [info@highpoints.co.uk](mailto:info@highpoints.co.uk)



## 7. Website

### Use of Cookies

A cookie is a piece of data about a website that is stored in your web browser. Cookies are often used to store choices about how you use the site to improve your user experience. The GOtC website makes use of cookies in this way, and also helps us get a feel for what it is you are looking at.

They're anonymous, they only give us information about the number of visitors to our site, so we don't know what you personally are looking at, just that someone has looked at what you've looked at.

Some parts of our site rely on cookies, but we will tell you where and when. Most browsers will allow you to control how cookies are handled, whether they are accepted and how long they are stored for. All browsers do this differently, but if you're concerned about privacy and security then please have a look in the 'help' documentation for your particular browser.

### External links on our website

Our website provides hyperlinks to other websites. This information is supplied in good faith; we exercise no control over linked sites and are not responsible for the privacy practices of other organisations and their websites. Each of these linked sites maintains its own independent privacy and data collection policies and procedures. If you visit a website that is linked to our site, you should consult that site's privacy policy before providing any personal information. This Privacy Statement applies solely to the information gathered by **High Points**. We are not responsible for the content or functionality of any of these external websites and this Policy does not apply to them.

## 8. How can I exercise my statutory rights?

You may contact us at [info@highpoints.co.uk](mailto:info@highpoints.co.uk) at any time to exercise any of the rights you are granted under applicable data protection laws, which includes;

- (1) the right to access your data
- (2) to rectify them
- (3) to erase them
- (4) to restrict the processing of your data
- (5) the right to data portability
- (6) the right to object to processing

Please note that we may require you to provide additional information to verify your identity.



You can also contact us at if you have any questions, remarks or complaints in relation to this privacy statement. If you have any unresolved concerns, you also have the right to lodge a complaint with your Data Protection Authority.

If you have any problems or queries about your data, please contact:

**The Company Directors**

**Telephone: 07794 639825 / 07721 070919**

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

**9. Data Breach**

If there is a breach in personal data security leading to its accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access. We will assess the risk to people's rights and freedoms and take appropriate action. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will inform those individuals without delay and notify the Information Commission Office within 72 hours.

We will document all breaches and near breaches of personal data security.

**10. Policy Amendments**

**High Points** reserves the right to amend this Privacy Policy at any time. Any change will be posted on our website and will take effect on publication. Your continued use of our website after changes are posted constitutes your acceptance of these Terms and Conditions.