



## Introduction

It is essential that people's privacy is protected through the lawful and appropriate use and handling of their personal information. The use of all personal data by Ascend Adventure is governed by:

- The General Data Protection Regulation (GDPR)
- The UK Data Protection Act 2018 (DPA)

So far as is reasonably practicable.

This policy was reviewed March 2021 and is reviewed every 2 years or sooner in the event of new legislation.

## Data Protection Principles

There are six Data Protection Principles defined in Article 5 of the GDPR. These require that all personal data be:

- processed in a lawful, fair and transparent manner.
- collected only for specific, explicit and limited purposes ('purpose limitation').
- adequate, relevant and not excessive ('data minimisation').
- accurate and kept up-to-date where necessary.
- kept for no longer than necessary ('retention').
- handled with appropriate security and confidentiality.

Ascend Adventure are committed to upholding the Data Protection Principles. All personal data under our control must be processed in accordance with these principles. The Directors are responsible for overseeing data protection.

## What is 'personal data'?

Personal data means information about a particular living individual. This might be anyone, including a customer, client, employee, partner, member, supporter, business contact, public official or member of the public.

It doesn't need to be 'private' information – even information which is public knowledge or is about someone's professional life can be personal data. Personal data may also include sensitive personal data as defined in the Act. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings. (Data Protection Act 1998)

## Service User personal information

The activities of Ascend Adventure involve the collection of personal information about service users, such as contact details, medical and dietary needs to enable us to offer adventurous activities safely and appropriately. This information will be handled and stored in compliance with the UK Data Protection Act, 2018 and GDPR. This information will not be passed on to other organisations/individuals.

What is 'processing'?

Almost anything we do with data counts as processing; including collecting, recording, storing, using, analysing, combining, disclosing or deleting it.

### Lawful Processing

Ascend Adventure will not do anything with data in breach of any other laws. We will use personal data in a way that is fair and not process the data in a way that is unduly detrimental, unexpected or misleading to the individuals concerned. We will be clear, open and honest with people from the start about how we will use their personal data

### Purpose Limitation and Data Minimisation

We will include details of our purposes in our privacy information for individuals using Ascend Adventure's services. We will collect data only if it is relevant for safe, effective participation in our projects and for marketing purposes. If we plan to use personal data for a new purpose, we will check that this is compatible with our original purpose or we will get specific consent for the new purpose. We will periodically (at least annually) review the data we hold, and delete anything we don't need.

### Accuracy

We take all reasonable steps to ensure the personal data we hold is not incorrect or misleading as to any matter of fact.

### Data Retention and Secure Destruction

We will not keep any personal data longer than we need. Ascend Adventure will only create and retain personal data where absolutely necessary. Regular reviews of files will be held and unnecessary or obsolete data will be systematically destroyed.

Data may be retained for differing periods of time for different purposes as required by statute or best practices. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

Ascend Adventure may store some data such as registers, photographs, books and records etc. indefinitely in its archive. All data will be stored securely.

All our participants, customers and marketing contacts have a 'right to be forgotten' and we will securely destroy data we hold about them at their request for erasure.

### Security and Data Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, data.

Ascend Adventure will take appropriate technical and organisational steps to ensure the security of personal data.

All sessional workers, trustees and volunteers will be made aware of this policy and their duties under the Act.

Ascend Adventure, Sessional Workers and volunteers are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed for the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite.

## Consent

Ascend Adventure makes the request for consent prominent and separate from our terms and conditions. We ask people to positively opt in and don't use pre-ticked boxes or any other type of default consent. We use clear, plain language that is easy to understand.

We specify why we want the data and what we're going to do with it.

We give separate distinct options to consent separately to different purposes and types of processing.

Ascend Adventure names our organisation and any third party controllers who will be relying on the consent. We tell individuals they can withdraw their consent at any time.

## Rights of Access to Information

Data subjects have the right of access to information held by Ascend Adventure, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to Ascend Adventure. The information will be imparted to the data subject as soon as is reasonably possible after it has come to Ascend Adventure's attention in compliance with the Data Protection Policy 2017.

## Exemption

Certain data is exempted from the provisions of the Data Protection Act which includes the following:-

- National security and the prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Ascend Adventure including Safeguarding.

## Employee obligation in relation to personal information

All staff, contractors, temporary workers, consultants, partners or anyone else working on behalf of Ascend Adventure and handling personal data are bound by the data protection legislation and this Policy and should ensure compliance with the following guidelines at all times:

- do not give out confidential personal information except to the data subject. In particular, it should not be given to someone from the same family or to any other unauthorised third party unless the data subject has given their explicit consent to this
- be aware that those seeking information sometimes use deception in order to gain access to it. Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone

- ensure any personal data you hold is kept securely, either in a locked filing cabinet or, if computerised, it is password protected
- never disclose any confidential personal data relating to clients, another employee, or third parties on social media sites
- Take care to email the intended recipient (especially where email address autocomplete is turned on). Use the 'bcc' field for emailing several people where using 'to' or 'cc' is not needed.

#### Beneficiaries, Participants, Referrers and Supporters

Beneficiaries, participants, referrers and supporters can read about the way we collect, control and process their data in our Privacy Policy available at [www.ascendadventure.co.uk](http://www.ascendadventure.co.uk)

#### Policy Review

This policy was last reviewed on: 1<sup>st</sup> March 2021

Date of next review: 1<sup>st</sup> March 2023