

Privacy Policy & Method Statement

Policy Introduced:

10th May 2018

Policy Reviewed by:

Penny Snowden, Director

Key contact details:

Data Protection Compliance Lead

Penny Snowden, penny@activeleaders.co.uk; 0118 9721315

Legislation and relevant guidance:

Active Leaders is committed to ensuring that policies and procedures remain up to date and are reflective of current legislation and guidance, currently including:

General Data Protection Regulation 2018

Privacy Policy Statement

Active Leaders Limited (ALL) provides training programmes in activity leadership and event management. ALL programmes are operated by ALL and Active Leader Operations Limited (ALOL).

ALL and ALOL are committed to protecting and respecting the privacy of its course participants, their parents/guardians/carers, our trainers, the course hosts and any other people from whom we collect data (collectively, you). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation 2018 (the Act), the data controller is Active Leaders Limited.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Lead has overall responsibility for data protection compliance in our organisations. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in application forms and/or forms on our Website. This includes information provided at the time of applying for a place on any course, or registering to use our site, or requesting further services which we may provide from time to time. We may also ask you for information on the telephone or if you report a problem with our site;
- We take photographs and videos of those participating in our courses, to which you have consented as part of the application and booking process. You have the right to opt out of this consent at any point;

- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you. This may be through our website, telephone or by post;
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

Personal information we may collect from you

When you sign up for services from us, you may provide us with or we may obtain **personal information** about you and potentially family members. This personal information may include:

- Personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- Date of birth of you or those on whose behalf you are booking or requesting services;
- Gender;
- Use of and movements through our online portal/database, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- Records of your attendance at any events and courses hosted by us;
- Your marketing preferences so that we know whether and how we should contact you.

Additional information for Trainers, temporary staff and volunteers

If you are a trainer appointed to deliver a course for us, a temporary members of staff or volunteer, or a sub-contractor to us or a third party who has registered his/her interest in working with us, you may also provide us with or we may obtain the following additional **personal information** from you:

- Identification documents such as passport and identity cards;
- Details of Disclosure and Barring Certificates and First Aid Certificates;
- Details of any club and/or county membership;
- Details of next of kin, family members, coaches and emergency contacts;
- Records and assessment of performance or coaching/activity leadership practice;
- Any disciplinary and grievance information;
- Any coaching code or official number;
- Coaching/teaching qualifications and/or officiating history;
- Accreditation/qualification start and end date;
- Employment and/or character references.

Special categories of personal information

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- Information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- Criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

In relation to the special category personal data that we process, we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis;
- It is necessary for the establishment, exercise or defence of legal claims;
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- Based on your explicit consent.

We refer to these as the “special category reasons for processing of your personal data”.

Where we collect your information

- We typically collect personal information about you when you create an account/make a booking or register on our site;
- When you purchase any services or products we offer online;
- When you purchase any services or products we offer via telephone to authorised ALL or ALOL personnel;
- When you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way;
- Face to face at events, fairs, presentations, during activities and courses – using paper based or computer formats;
- During our events/activities/courses in the form of photography or video (only with explicit consent from you, please see notes on photography use and storage periods);
- When collecting feedback through face-to-face or computer-aided methods such as Survey Monkey, Google Forms etc;
- When we take images for use in promotional pieces (newspaper/internet), or for current and future publications and/or marketing such as on Facebook, Twitter, Instagram, our Website and on printed literature;
- If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

Where we store your personal data

The data that we collect from you will be stored in the United Kingdom and processed by authorised personnel who work for us or for one of our suppliers. Such personnel may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support and other services.

By submitting your personal data, you agree to this storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Paper based information is stored in the following ways:

- At our office in closed storage cabinets (and kept for an agreed period)
- With our trainers and staff who have been DBS checked and have been trained on their responsibilities in relation to this information

Once the paper based resources have been used for the purpose that they have designed and/or the information on them has been uploaded into a computer file or database, then we will destroy in a secure manner as much as is reasonably practicable and in order that it does not affect either your or our rights in relation to legal matters.

Any photographs and/or videos of participation in our courses/events will be used solely for the production of promotional materials in printed or electronic form, including websites, multimedia productions, social media posts, course leaflets, prospectuses, advertisements and by our sponsors and partners for the same promotional and marketing purposes.

We will normally store the information we collect for no longer than 5 years. We will usually store photographs and video securely for no longer than 5 years. However such images may be selected for inclusion in our archive and be retained indefinitely.

Uses made of the information

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to perform our services to you or comply with legal obligations and we may have to terminate your position as a customer. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to

properly perform our contract with you. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

Direct Marketing Email, post and SMS marketing

We may contact you by email, post or SMS with information about products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at info@activeleaders.co.uk. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

Disclosure of your personal information

We share personal information with the following parties and for the following reasons:

- **Any party approved by you.**
- **To any governing bodies, education bodies or regional bodies for the activities covered by ALL and ALOL:** to allow them to properly administer the services on a local, regional and national level.
- **Other service providers:** for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- Our supply chain partners and sub-contractors, such as couriers, import/export agents, shippers;
- **Our Commercial Partners:** for the purposes of providing you with information on any benefits provided by our commercial partners and where you have given your permission for us to do so;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If ALL and/or ALOL or substantially all of its/their assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- In order to enforce or apply our terms and conditions, or to protect the rights, property, or safety of ALL, ALOL, our customers, or others. This includes

exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Transferring your personal information internationally

The personal information we collect is not transferred to and stored in countries outside the UK and the European Union.

How long do we keep personal information for?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. In some cases personal information may be retained on a long-term basis, for example personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 5 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired;
- We will normally only market future courses and programmes to those who have booked within the last 3 years, although previously submitted information may be kept on our database for the above stated period.

It is important to ensure that the personal information we hold about you is accurate and up to date and you should let us know if anything changes, for example if you change your phone number or email address. You may update the personal information we hold about you by contacting us using the details set out in the “**Contacting us**” section below.

Your rights

Your rights in relation to personal information

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used;
- The right to access the personal information we hold about you;
- The right to request the correction of inaccurate personal information we hold about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider; and

- The right to object to certain automated decision-making processes using your personal information.

You have the right to ask us not to process your personal data or the personal data of your family members or those in your care for marketing purposes. We will usually inform you (before collecting such data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below. If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Changes to our privacy policy

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the start of this notice. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Access to information

To access your information please contact us directly at info@activeleaders.co.uk or by calling 0118 9721315 and we will advise on the best way for us to process your request.

Contact

Questions, comments and requests regarding this privacy policy should be addressed in writing to Penny Snowden, Head of Active Leaders, at 24 Kennylands Road, Sonning Common, Reading RG49JT or info@activeleaders.co.uk.

Special Notes:

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general Internet usage by

using a cookie file, which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser, which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that our sponsors and/or advertisers may also use cookies, over which we have no control.

Our site may contain links to and from the websites of our partner networks, advertisers, sponsors and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our Legal basis for capturing and processing data

In addition to managing information correctly, ALL and ALOL must, to be compliant with EU GDPR, also have a legal basis for capturing and processing data. The six legal bases are shown below:

- 1. Contractual necessity:** the processing is necessary for a contract with you or because you have asked us to take specific steps before entering into a contract (e.g. when delivering a course to you).
- 2. Legal obligation:** the processing is necessary to comply with the law (not including contractual obligations) e.g. being compliant with EU GDPR.
- 3. Vital interests:** the processing is necessary to protect the life of an individual e.g. a young person's medical data.
- 4. Public interest:** the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law e.g. matters pertaining to national security.
- 5. Legitimate interests:** the processing is justified as part of our core business, or necessary to be able to carry out our stated aims.

6. Consent: you have given clear consent for us to process your personal data for a specific purpose e.g. allowing ALL or ALOL to market to you or collect feedback data.

NOTE: under the U.K. implementation of the EU GDPR, the age of consent, i.e. the age at which an individual can agree to share personal information or sign up to programmes, is 13 years of age.