

# Privacy Policy



## These are the key facts:

### *You can always:*

- ask us for a copy of the information we have about you
- ask us to update the information we have about you
- ask us to delete the information we have about you

### *We will always:*

- follow the law on how we can keep and use the information we have about you
- make sure our policies are the best they can be
- keep the information in safe storage protected by secure passwords

### *We will never:*

- give the information we have about you to anyone else, unless...
  - ...you tell us we can
  - ...we think that doing so will protect you from harm
  - ...the law says we have to (e.g. to prevent a crime)
- tell people about our work with you in a way that you can be identified, unless you have told us we can
- use the information you have given us to sell you anything, unless you have told us we can

You can contact us at at [info@activeleaders.co.uk](mailto:info@activeleaders.co.uk).

Active Leaders Limited (ALL) and Active Leader Operations Limited (ALOL) provide training programmes in activity leadership and event organisation, provide leadership consultancy and deliver activity programmes and produce publications.

ALL and ALOL are committed to protecting and respecting the privacy of their course participants, 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 and held by us.

For the purpose of the Data Protection Act 2018, the data controller is Active Leaders Limited (ALL) for both ALL and ALOL.

**Policy Introduced:** 10<sup>th</sup> May 2018 and revised November 2020

**Legislation and relevant guidance:** We are committed to ensuring that policies and procedures remain up to date and are reflective of the current legislation and guidance: The Data Protection Act 2018 which includes the General Data Protection Regulations 2018.

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Our Data Protection Compliance Lead has overall responsibility for data protection compliance in our companies. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

## **Our legal basis for processing data**

We process your data for one or more of the following reasons:

1. Consent: you have given clear consent for us to hold and process your personal data for marketing purposes or in accordance with the photographic permission you have provided;
2. Contractual necessity: so that we can provide our services to you or to provide information to you in advance of delivering our services to you in accordance with our Terms and Conditions;
3. Vital interests: to protect your life such as if you have specific medical needs;
4. Legal obligation: the law says we have to.

**NOTE:** the age at which an individual can agree to share personal information or sign up to programmes is 13.

## **Information we may collect from you**

We may collect and process the following data from you:

- Information that you provide by filling in paper forms, forms on our website ([www.activeleaders.co.uk](http://www.activeleaders.co.uk)), registering to use our site, or requesting further services which we may provide from time to time;
- Information you provide on the telephone or face to face;
- Photographs and videos of your participation in our courses, to which you have consented as part of the application and booking process (please see notes on photography use and storage periods);
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Information we collect if you complete our surveys which we use for research purposes;
- 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.

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## 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, usernames 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;
- Details of next of kin, family members, coaches and emergency contacts including doctors.

## Additional information we may hold on course participants

We hold the personal report provided by the trainer of each course for each individual who has completed a course with us in accordance with our Terms and Conditions.

## Additional information for Trainers, temporary staff and volunteers

If you are a trainer appointed to deliver a course for us, a temporary member 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 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/leadership qualifications and/or officiating history;
- Accreditation/qualification start and end date;
- Employment and/or character references.

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## Special categories of personal information

We may also collect, store and use the following more sensitive personal information regarding you:

- Information about your health, including any medical condition, health and sickness records, medical records, health professional information, access requirements (called special category personal data);
- personal data relating to criminal convictions and offences, or related security measures (called criminal offence data).

In relation to the processing of special category personal data or criminal offence data we will ensure that such processing is generally lawful (in accordance with Article 6 of GDPR), fair and transparent and complies with all the other principles and requirements of Article 9 of the GDPR.

## 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 a telephone call 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, conferences, 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;
- 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 (only with explicit consent from you, please see notes on photography use and storage periods);
- 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 them. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

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## Where we store your personal data

The data that we collect from you will be stored 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 local password protected machines backed up to a secure server or those of our partners and/or sub-contractors. 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 of this information as is reasonably practicable and in order that it does not affect either your or our rights in relation to legal matters.

## Photography and image use

Any photographs and/or images/videos of your participation in our courses/events which you have consented to us taking, will be stored and processed by authorised personnel who work for us or for one of our suppliers. Such images are stored on our local password protected machines backed up to a secure server or those of our partners and/or sub-contractors.

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We may use such images for course reports, the production of promotional materials in printed or electronic form, our website, multimedia productions, social media posts, course leaflets, prospectuses, advertisements and by our official partners for the same promotional and marketing purposes.

## **Storage periods**

We will normally store the information we collect for 5 years after your last interaction with us. In some cases, personal information may be retained on a long-term basis, for example if we need to retain it for legal purposes in accordance with commercial practice and regulatory requirements, or to process a claim.

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.

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.

## **Withdrawal of consent**

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, social media 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](mailto:info@activeleaders.co.uk).

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## Disclosure of your personal information

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

- To any governing bodies, education bodies or regional bodies for the activities covered by ALL and ALOL;
- Other service providers, for example, email marketing specialists, payment processors, data analysts, 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 partners, for the purposes of providing you with information on any benefits provided by them, if you have consented to being contacted for marketing purposes;
- The Government or our regulators, where we are required to do so by law or to assist with their research or initiatives;
- Police, law enforcement and security services - to assist with the investigation and prevention of crime and the protection of national security.
- If 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 countries outside the UK but may be stored on servers outside the UK.

## 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;
- The right to restrict processing of your personal information;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data to you; and
- The right to object to certain automated decision-making processes using your personal information.

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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.

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. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

## 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](mailto:info@activeleaders.co.uk) or by calling 0118 9721315 and we will advise on the best way for us to process your request.

## 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 partners. 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.

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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 partners may also use cookies, over which we have no control.

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

## Contacting us

Questions, comments and requests regarding this privacy policy should be addressed in writing to Penny Snowden, CEO, at [info@activeleaders.co.uk](mailto:info@activeleaders.co.uk).

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