

PRIVACY NOTICE – Yorkshire and Sherwood Climbing Companies

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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to the collecting/processing of their personal data.
- 2.2 All Employees/Staff of the organisation who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Yorkshire and Sherwood Climbing Companies has been one of the market leading indoor climbing providers in the UK for 10 years. With sites across the UK we aim to provide the latest and best training facilities for climbers of all abilities.

Due to our locations across the UK we can offer a single registration which covers all sites and enables quick and easy access to customers visiting a site.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- dpo@theclimbingdepot.com
- 0113 345 9295

The personal data we would like to process on your behalf is:

Personal data type:	Source (where Yorkshire and Sherwood Climbing Companies Ltd obtained the personal data from)
All customers	
First name*	Provided by the customer when registering to use a Yorkshire and Sherwood Climbing Companies operated centre. Via a digital registration form.
Middle name *	
Last Name *	
Phone numbers *	Provided by the customer when registering to use a Yorkshire and Sherwood Climbing Companies operated centre. Via a digital registration form.
Address (Inc. postcode) **	
Date of Birth *	
Emergency contact name *	
Emergency contact phone number *	
Email address *	

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Details of purchases made on customer account**	
Photograph of account holder (unsupervised 14+ year olds)	Provided by the customer when registering to use a Yorkshire and Sherwood Climbing Companies operated centre. Via a digital registration form.
Signatures and initials on waiver *	
Those under 18 years	
Parent/guardian name *	
Parent/guardian phone number *	Provided by the customer when registering to use a Yorkshire and Sherwood Climbing Companies operated centre. Via a digital registration form.
Relevant medical conditions *	
Medicines taken and allergies *	
Dietary requirements (parties only)	
Visit log including dates and times *	

Above fields marked with * are required for system functionality, ** some information is required.

The personal data we collect, depending on the role, will be used for the following purposes:

- Registration
- Identification of customer on visiting the centre
- Contacting named emergency contacts in the event of an emergency
- Marketing from Yorkshire and Sherwood Climbing Companies Ltd (where permission has been given)
- Emergency Evacuation
- Verifying identity for payments processed by Stripe (www.stripe.com) on our behalf. This happens once permission has been given by the customer.

Our legal basis for processing for the personal data (Article 6(1b));

- processing is necessary for the performance of a contract to which the customer has agreed when registering to climb at the centre
- We are required to collect the information in the form of a waiver showing consent and understanding before allowing anyone to participate in activities at the centre.
- Article 6 (1f) - Necessary for the purposes of the legitimate interests pursued by the controller.
- The Regulatory Reform (Fire Safety) Order 2005 England and Wales - Requires an emergency evacuation plan that includes ensuring all those on site are safe and accounted for.

3.2 Consent

You are giving Yorkshire and Sherwood Climbing Companies Ltd permission to process the personal data supplied specifically for the purposes identified. Yorkshire and Sherwood Climbing

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Companies Ltd collects data under the terms identified in Article 6 ‘Lawfulness of processing’ of the General Data Protection Regulation.

Where consent is required for Yorkshire and Sherwood Climbing Companies Ltd to process personal data, it must be explicitly given.

You may withdraw consent at any time by contacting the Data Protection Officer at Yorkshire and Sherwood Climbing Companies using the contact details above.

3.3 Disclosure

Yorkshire and Sherwood Climbing Companies Ltd will not release the information to any third party unless the request is subject to legal obligation without obtaining the express written authority of the partner who provided the information.

3.4 Retention period

We retain your personal information for as long as necessary to provide the Services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our policies.

For more information on storage and processing security, please contact Yorkshire and Sherwood Climbing Companies Ltd using the details above.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

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- Right to judicial review: if The Yorkshire and Sherwood Climbing Companies Ltd refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be dealt with in line with Yorkshire and Sherwood Climbing Companies Ltd's Subject Access Procedure and will be shared with the customer should a request come from directly a subject.

3.6 How do we protect your Personal Information?

We protect your personal information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption.

The Wall is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information.

Your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers which have features to prevent unauthorised access.

3.7 Third parties

We use several third parties to process and administer customer information. We only use companies who show full compliancy with the GDPR legislation.

Source	What we use them for	GDPR compliant
Rock Gym Pro	Entry system and database storage on US servers	Yes - US privacy Shield
Sagepay	Website shop payments	Yes
Stripe	Website online bookings and e-billing monthly payments	Yes - US privacy Shield
Sendgrid	Automated emails from Rock Gym Pro and newsletter mailouts	Yes - US privacy Shield
Mailchimp	Website mailing for website shop transactions	Yes - US privacy Shield
Googlemail	theclimbingdepot.com email addresses for company use	Yes - US privacy Shield
Worldpay	PDQ terminal transactions within the centre	Yes
ABC/NIBAS	Registration for the NIBAS scheme	Yes

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3.8 Cookies

INFORMATION COLLECTED AUTOMATICALLY

Whenever you interact with any part of our Website, we automatically receive and record information on our server logs from your browser including your IP address, “cookie” information, and the page you requested. “Cookies” are identifiers we transfer to your computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our Website are visited and by how many people. The usage information we gather automatically from the Website will always be used in aggregate and never in a way that is personally identifiable.

3.9 Complaints

If you wish to make a complaint about how your personal data is being processed by Yorkshire and Sherwood Climbing Companies Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and schools/organisation’s data protection representatives.

The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer contact details
Contact Name:	Information Commissioners Office	Yorkshire and Sherwood Climbing Companies Limited
Address line 1:	Wycliffe House	The Depot Climbing Centre
Address line 2:	Water Lane	173 Richardshaw Lane
Address line 3:	Wilmslow	Stanningley
Address line 4:	Cheshire	Leeds
Address line 5:	SK9 5A	LS28 6AA
Email:	registration@ico.org.uk	dpo@theclimbingdepot.com
Telephone:	0303 123 1113	0113 345 9295

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Signature: *Daniel Crossdale*

Date: 22/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Dan Crossdale	15/05/2018

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