

## STUBBERS ADVENTURE CENTRE PRIVACY POLICY

### Scope

This document supersedes all earlier versions and is designed to meet the requirements of the General Data Protection Regulation (GDPR), the Privacy and Electronic Communication Regulations (PER) and any legacy data concerning the Data Protection Act. These combined rights cover the safeguarding of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

### Who we are

Stubbers Adventure Centre (company number 03193408) and Stubbers Training Limited (company number 3755730) (Stubbers) are both registered in England at 169 New London Road, Chelmsford, Essex. RM142TY. For the purpose of this document Stubbers will refer to both entities. We are committed to maintaining the trust and confidence of visitors to our centre and users of our website and online booking systems. Stubbers specialises in the provision of adventurous activities and residential camps for Schools, non-school groups of young people adults and families.

### Personal data

We are not in the business of renting or trading email lists with other companies and businesses for marketing purposes. But we do need some personal data to make sure you get the excellent service you deserve, to fulfil our contractual obligations for a booking or service you have purchased from us; or to contact you with regards to employment or manage your data if you are an existing employee. If you give consent, we will also communicate with you our news, special offers, competitions or other content where you have expressed an interest, using your chosen method(s) of opt in contact. In this Privacy Policy we've provided lots of detail information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure. The data that we collect directly from you will be stored on our servers in the UK however any website analytics processed by Google maybe held outside the EEA in accordance with the EU-US Privacy shield. At all times Stubbers will take steps to ensure that your data is treated securely and in accordance with GDPR and other data protection legislation.

### The information we collect

**Stubbers receives and stores information you enter on a website or give us via telephone or email. This will include information that can identify you (personal information) and may include your first name, last name, telephone number and postal addresses. If you enter into correspondence with us regarding a booking, enquiry or complaint we may also keep details of that correspondence. You can choose not to provide information to us, but in general some information about you is required in order for you to register an account, purchase products, participate in a survey, competition or promotion, sign up for a newsletter, apply for a job or ask us a question.**

### COOKIES

We use a system of classifying the different types of cookies which we use on the Website, or which may be used by third parties through our websites. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device.

**What is a cookie?** - Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are

then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

### **How long are cookies stored for?**

**Persistent cookies** - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

**Session cookies** - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

### **Cookies used on the website**

A list of all the cookies used on the Website by category is set out below.

**Strictly necessary cookies** These cookies enable services you have specifically asked for. These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas of the Website.

**Performance cookies** - These cookies collect anonymous information on the pages visited. By using the Website, you agree that we can place these types of cookies on your device.

These cookies collect information about how visitors use the Website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the Website works.

**Functionality cookie** - These cookies remember choices you make to improve your experience. By using the Website, you agree that we can place these types of cookies on your device.

These cookies allow the Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

**Third party cookies** These cookies allow third parties to track the success of their application or customise the application for you. Because of how cookies work we cannot access these cookies, nor can the third parties access the data in cookies used on our site.

**Web push software** – We use companies such as **OneSignal** to push web and mobile notifications to customers. When a customer visits our website they are provided with the opportunity to opt in to the service. The GDPR statement relevant to that service will be provided adjacent to the opt in button for that service. Prior to using such a service Stubbers Adventure Centre will seek confirmation that the service provider is GDPR compliant.

## **Google Analytics**

When someone visits [www.Stubbers.co.uk](http://www.Stubbers.co.uk) and [www.smashcamps.co.uk](http://www.smashcamps.co.uk) and [walledgardenevents.co.uk/](http://walledgardenevents.co.uk/) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

## **SOCIAL MEDIA**

### **Social media services**

You can choose to access certain third party media websites and services (such as Facebook) through our site. When you do so you are sharing information with those sites and the information you share will be governed by their privacy policies. You may be able to modify your privacy settings with these third party social media websites. Please refer to the relevant provider policies for more information.

The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

### **External links**

If any part of the Stubbers website links you to other websites, these websites do not operate under this Privacy Notice. Stubbers recommends that you examine the privacy policies posted on these other websites to understand their procedures for collecting, using and disclosing personal information.

### **Wi-Fi**

Wi-Fi – at time of writing we are not providing Wi-Fi to clients as a service. But for employees and in exceptional circumstances where we do provide access to the Stubbers Wi-Fi to visitors we may collect data about your device, volume of data you use, the websites and applications which you access and your usage by access time frequency and location

## **USING YOUR INFORMATION**

### **Booking Data**

Booking - When you book an activity session or programme at Stubbers, purchase merchandise, membership or gift voucher(s) through the Stubbers Adventure Centre online booking system your name, address data, email and contact number will be stored in our third party online booking system. You may, of course, make a booking in person without supplying the aforementioned personal data online. Please be assured that we do not share your personal details with any other company without your consent. Booking confirmation details, programmes and invoices will be sent to you as email attachments from password protected Stubbers customer service employee accounts. We use credit card information (such as cardholder name, credit card number, and expiration date) for the purpose of completing any bookings or purchases that you conduct on our site, which is PCI compliant.

### **Telephone recording policy**

Stubbers Adventure Centre has a telephone system that is capable of recording conversations. Like many other organisations, this is a standard practice that allows the recording of telephone calls for quality monitoring, training, compliance and security purposes.

All calls received into centre will be recorded by Stubbers and will be retained for a period of two years which is consistent with the possible maximum period for which we take advance bookings. These recordings will only be used for the purposes specified in this policy.

In order to maintain high standards and protect the public and staff we need to record all telephone calls received into the Customer Advice and Information Centre and retain them for a limited period of time.

We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation. This includes:

The Regulation of Investigatory Powers Act 2000;

- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- The Telecommunications (Data Protection and Privacy) Regulations 1999;
- The Data Protection Act 2018; and
- The Human Rights Act 1998.

### **Scope of policy**

Under normal circumstances a call will not be retrieved or monitored unless:

- It is necessary to investigate a complaint;
- It is part of a management 'spot check' that customer service standards are being met;
- There is a threat to the health and safety of staff or visitors or for the prevention or detection of crime;
- It is necessary to check compliance with regulatory procedures; or
- It will aid standards in call handling through use in training and coaching our staff. However, this will only be permitted if the recording is edited so that the caller remains anonymous and the member of staff who was party to the call agrees to its being used in this way.

If it becomes clear that a communication is private or the person making the call says that they do not wish to have their call recorded, the call recording will be stopped. You have the option to ask for recordings to be deleted but as the recording is an integral part of our management of business transaction if you do exercise the right to delete we will be unable to process your booking

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the Data Protection Act 1998. It will be:

- Adequate, relevant and not excessive;
- Used for the purpose(s) stated in this policy only and not used for any other purposes;
- Accessible only to managerial staff after securing permission from the Centre Director;
- Treated confidentially;
- Stored securely; and
- Not kept for longer than necessary and will be securely destroyed once the issue(s) in question have been resolved.

Where call recording facilities are being used we will inform the caller that their call is being monitored/recorded for quality / training purposes so that they have the opportunity to consent by continuing with the call or hanging up.

### **Mailing lists**

As part of the booking process we collect personal information. We use that information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses. But we do want to make it easy for you to take advantage of the adventure activity opportunities on our website. One way we do this is to send you email messages that contain information about your adventure activity interests. For example, we may send you an email or contact you if you have attempted to make a booking. Please note that you will have the opportunity to choose not to receive these email messages in any such email we send.

We use a third-party provider, Active Campaign, to deliver our customer information and sales updates. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our marketing to ensure you receive the information that is relevant and of interest to you. For more information, please see Active Campaigns Privacy notice. You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer [Name required Here]

At the end of your visit and from time to time we like to find out how well we are doing so we can be continually improving our service. For this we use Survey Monkey. The surveys will ask you for general information about your visit and a name by which we can identify your group or individual. There will be the option to provide an email address or telephone number so we can get back to you in person to discuss any points in detail.

### **Keeping you safe**

Your safety and well-being is our highest priority. So before taking part in activities we will ask you to complete a form with your name, emergency contact details and disclosure of some essential safety information such as confidence in water and any medical conditions that we need to know about. If you are uncomfortable about giving those details in writing then you should ask to speak in confidence with a manager who will agree with you what information should be shared in confidence with the activity instructor.

We are required by our insurers to documentation that may be relied on in the event of future claims for 3 years or for children until 3 years and 4 months after their 18<sup>th</sup> birthday. In the event of a liability claim the details from these forms along with any accompanying accident reports may be shared with the insurance company

### **Employee data**

We keep such information and data on employees that is required to ensure that our contractual and statutory obligations to employees can be met. This includes personal address and email National Insurance number and Bank account details and medical information relevant to the employment. We also keep records of attendance, training records and copies of performance reports. The information is mostly embedded in our centre management software or the personnel section of the onsite server. Access to data is password protected with permission only given to tier 3 management or above on a need to access basis. Employee data is retained for up to [.....] years after the last day of employment. Employees wishing to view all or any data help on them should put a request into the Data Administrator who will respond within [.....] days

### Third parties

Stubbers Adventure Centre do not share personal data with third parties when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Stubbers, the website or users of the website; and in connection with our terms of use and other agreements. In connection with a corporate transaction, such as a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

## COMPLIANCE

### Complaints

In the event you wish to make a complaint about how your personal data is being processed by Stubbers or its data processors you have the right to complain to Stubbers. If you do not get a response within 30 days you can complain to the ICO. Details for these contacts are:

**Stubbers:** The Data Protection Officer, Stubbers Adventure Centre, Ockendon Road, Upminster, Essex. RM142TY. Telephone 01708224753 or email [info@stubbers.co.uk](mailto:info@stubbers.co.uk) for attention of the Data Protection Officer

ICO: Wycliffe House, Water Lane, Wolmslow, SK9 5AF. Telephone 0303 1231113 or email [www.ico.org.uk/global/contact-us/email/](http://www.ico.org.uk/global/contact-us/email/)

### Access to your personal information

You are entitled to view, amend, or delete the personal information that we hold about you and to know how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable
- The purpose of the processing as well as the legal basis for processing
- If the processing is based on the legitimate interest of Stubbers and and for more information about those interests
- The categories of personal data collected, stored and processed
- Recipients or categories of recipients that the data is/will be disclosed to
- How long the data will be stored
- Details of your rights to correct, erase, restrict or object to such processing
- Information about your right to withdraw consent at any time
- How to lodge a complaint with the supervisory authority (ICO)
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data
- The source of personal data if it wasn't collected directly from you
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

Email your request to our data protection officer at [info@stubbers.co.uk](mailto:info@stubbers.co.uk).

When information on your personal data is requested Stubbers will accept the following forms of ID: a copy of your driving licence, passport, birth certificate and a utility bill not older than 3 months. A



minimum of one piece of photographic ID listed above and a supporting document is required. If Stubbers is dissatisfied with the quality, further information may be sought before personal data can be released.

### **Updates to our privacy notice**

We may update this privacy notice from time to time, each version has a sequential number to enable you to identify the latest version. Your continued use of this site will constitute your agreement to any changes we may make. If you have opted in to receive marketing communications you will be emailed a copy if we update our privacy notice.