# BoulderWorld Privacy Policy



Here at BoulderWorld we take our data protection seriously and want you to feel happy about sharing your personal information with us.

We have worked hard to make sure we are compliant with the new GDPR legislation which has included working closely with the third party companies we use.

Our new Privacy Policy explains how what we collect, why we collect it and how it is stored. Full information on your rights and how you can action them is also included.

If you have any questions for for further information please email;

lucy@boulderworldbelfastclimbingcentre.co.uk



# 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?

BoulderWorld LTD is the leading indoor bouldering provider for Northern Ireland for 5 years.With our site in Belfast we aim to provide the latest and best training facilities for climbers of all abilities.

We can offer a single registration which covers our current site and all future sites and enables quick and easy access to customers visiting us

Our Data Protection Officer and data protection representatives can be contacted directly here: • lucy@boulderworldbelfastclimbingcentre.co.uk •02890662007

The personal data we would like to process on your behalf is: All customers First name\* Last Name \* Provided by the customer when registering to use a Boulderworld LTD centre. Via a digital registration form.

Phone numbers Address (Inc. postcode) Date of Birth Emergency contact name Emergency contact phone number Email address Details of purchases made on customer account\*\* Check box indicating signature on waiver Those under 18 years As above and additional-Parent/guardian name Parent/guardian phone number Relevant medical conditions Medicines taken and allergies Visit log including dates and times

All users create a user name and password to enable them to log into the account and view their data / amend their data at any time.

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 BoulderWorld LTD (where permission has been

given)

Emergency Evacuation

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 BoulderWorld Ltd permission to process the

personal data supplied specifically for the purposes identified. BoulderWorld Ltd collects data under the terms identified in Article 6 'Lawfulness of processing' of

the General Data Protection Regulation.

Where consent is required for BoulderWorld Ltd to process personal data, it must be explicitly given.

You may withdraw consent at any time by contacting the Data Protection Officer at BoulderWorld Ltd using the contact details above.

## 3.3 Disclosure

BoulderWorld 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 BoulderWorld Ltd using the contact information 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.

• Right to judicial review: if BoulderWorld 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.

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 via our online registration portal E-Leisure produced by our reception system SportSoft Ltd.

We are 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 our information.

Your personal information is only accessible by appropriately trained staff 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 - SportSoft - Entry system and database storage on UK servers - GDPR Compliant - Yes Source - GoCardless - Direct Debit payments - GDPR Compliant - Yes

Source - Google Mail - boulderworld@gmail.com - GDPR Compliant - Yes

## 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 recognise 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 BoulderWorld 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.



# 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: Lucy Mitchell Date: 11.03.2019

**Change History Record** 

1 - Initial Document - 20.05.2018
2- Addition of online DD provider 11.03.2019