

Adventure Café & UK GDPR

Privacy Policy



Data Protection Mitigation

1.0 Adventure Café holds an Information Commissioner's Office certificate.

1.1 All leaders are required to read this policy document as part of their training alongside further guidance outlined in their leader handbook.

1.2 Adventure Café annually reviews data protection standards annually.

1.3 Adventure Café commits to following the most current data protection standards and in line with the Data Protection Act 2018.

Collection of Data

2.0 Adventure Café will request next of kin & medical information from all participants (data subjects) to allow our team to make informed decisions in the case of an emergency.

2.1 Adventure Café works closely with companies & charities to establish best practice in the collection & transfer of personal data.

2.2 Adventure Café will either collect personal data from one of the following methods:

- a) Direct data collated from participants signing up through Adventure Café's online booking form. Adventure Café uses Google Forms as their secure cloud server.
- b) Transfer of data collated by our client via encrypted spreadsheets via a Google Form online or Microsoft SharePoint.

2.3 Adventure Café may require last minute participants to complete a paper registration / medical form. In this instance paper copies will be typed up and saved to the secure cloud as soon as practicably possible & the paper copies destroyed.

Containment of data

3.0 Participant data will be held on the secure cloud server only and never downloaded.

3.1 All participant data available to Adventure Café will be password protected.

3.2 Adventure Café will only use participant data for the purpose of risk prevention and safety management and will not share any participant data with third parties.

3.3 Adventure Café are required to retain participant data on the secure cloud server for 3 years in the case of legal / medical claims. After 3 years data will be destroyed.

Interpretation of data

4.0 Adventure Café will vet all participants to ensure they are safe to partake in a challenge event. Should there be any doubt, Adventure Café shall make contact with the participant to discuss further and request a doctor's letter if appropriate.

Printing of Data

5.0 Adventure Cafe is required to print paper copies of participant data for leader awareness and participant safety on event.

5.1 Adventure Cafe will print the data in a three-part system so that any data on a single sheet cannot be interpreted by anyone else as an additional failsafe measure (*please see Schedule 1*). Each component will be physically retained by leaders in separate places. The 3 components of data are as follows:

5.1.1 Participant Event Number, Name and Mobile Phone Number (*Schedule 1a*).

To be retained by all event leaders in waterproof phone/map case or in secure zipped pocket.

5.1.2 Participant Event Number & Medical Details (*Schedule 1b*).

To be retained by all event leaders in waterproof casing within their First Aid Kits.

Data to include the following:

- a) Dietary Requirements
- b) Allergies
- c) Medical Conditions
- d) Current Medication

5.1.3 Participant Event Number & Emergency Details (*Schedule 1c*).

To be held only by the Event Manager in their Event Management Folder along with all other personal data components. This data must be always kept on the Event Managers person or stored securely within a support vehicle.

Data to include the following:

- a) Male/Female
- b) Date of Birth
- c) Address
- d) Postcode
- e) Home Telephone
- f) Next of Kin Name
- g) Next of Kin Relation
- h) Next of Kin Phone Contact

5.2 Participants will be provided with an event number upon registration. Participants are required to always display their number whilst on activity. Event numbers will be issued via a wristband, armband, helmet sticker or on a lanyard.

Leader's Use of Data

6.0 Leaders will be informed of any serious medical issues upon the event briefing.

6.1 Leaders will be able to identify participants through their event number and refer to the participant data available to them if required in an emergency.

6.2 Leaders briefed around confidentiality. Participant data should never be shared with any third party except in the event of an emergency with the emergency services and anyone else necessary to assist in keeping the participant safe.

Mobile Phone Number Sharing Agreement

7.0 Participant phone numbers may be entered into an Adventure Café emergency phone and deleted immediately after the event.

7.1 A participant WhatsApp group may be set up if permission is granted from the charitable or corporate partner.

7.1.2 The WhatsApp group will be a primary method of communication whilst on event. This encrypted messaging service is recommended to our clients and participants.

Participant Data Destruction

8.0 All paper copies of participant data required for the event are destroyed immediately after an event. Leaders must do one of the following post event:

- a) Hand in personal data to the event manager
- b) Burn the data
- c) Shred the data

8.1 Any participant data required for writing up incident/accident or near miss reports will be retained by the event manager for the Adventure Café Health & Safety Log.

Use of Images, Videos, Statements and Logos

9.0 Adventure Café will use the name and logo of the company/charity during the term of engagement for promotional and participant information material with the prior approval of the company/charity.

9.1 Adventure Café leaders will take photographs and videos on the event for future marketing & information documents.

9.2 Photographs and/or video may be shared with participants via chat groups (e.g. WhatsApp) or via email post event. We advise all organisations working alongside Adventure Café to inform their participants/challengers of this.

9.3 An individual can opt out of being included in photos. Charities & companies must inform Adventure Café of any individuals who wish to opt out of photos. Leaders will also provide an oral briefing regarding photo's. Individuals may choose to opt out on the day of the event.

9.4 Permission will be requested for any statement, message or image, whether oral, print or video for marketing, promotion or social media usage.

Data Processing Terms & Conditions

10.1 Adventure Café Ltd will be a data processor acting on behalf of the charitable/corporate partner in relation to the processing of Participant Data. Where Adventure Café collects and processes personal or sensitive information in relation to the safety and wellbeing of the participants, Adventure Café will be the Data Controllers for this information.

10.2 Adventure Café will notify its corporate/charitable partner immediately if they consider that any of their client's instructions infringe Data Protection Laws.

10.3 Adventure Café will implement the appropriate technical and organisational measures outlined in this policy to protect the security of Personal Data processed in performance of the services required, and to protect Personal Data against unauthorised or unlawful processing, accidental or unlawful destruction and damage or accidental loss, alteration, unauthorised disclosure, or access.

10.4 Adventure Café will comply with all laws that apply as a data processor of Personal Data and provide the charitable/corporate partners with co-operation, assistance and information as they may request, to comply with its obligations under the Data Protection Laws or to another data controller of the Personal Data, provided by the charitable/corporate partner.

10.5 Adventure Café will only disclose Personal Data to, or allow access by, its staff and freelancers who have had appropriate guidance in data protection matters, are bound by professional confidentiality obligations, and whose use of Personal Data is necessary for the performance of their job function.

10.6 Adventure Café ensures all employees and freelancers who can access Personal Data are appointed as persons in charge of the processing and are informed of its confidential nature and do not publish, disclose or divulge any of the Personal Data to any third party.

10.7 Adventure Café will notify the charitable/corporate partner without undue delay and no later than within 24 hours of becoming aware of any Security Incident with all relevant details reasonably available, or required by Data Protection Laws, and provide reasonable cooperation and information to assist in the investigation, mitigation and remediation of a Security Incident, and keep the charitable/corporate partner properly informed.

10.8 Adventure Café will only carry out data processing as necessary for the purposes of its engagement with the charitable/corporate partner and in accordance with this policy.

10.9 Adventure Café shall comply with any, and all, of its obligations under this policy (and any Schedules forming part of the Agreement), Data Protection Laws and Applicable Laws.

Summary of Definitions:

"Applicable Laws" means all applicable laws, statutes, regulations and codes from time to time in force;

"Data Protection Laws" means: (a) Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (the "General Data Protection Regulation"); (b) the version of the General Data Protection Regulation in force in the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018; (c) any legislation in force from time to time in the United Kingdom which implements the European Community's Directive 95/46 EC and Directive 2002/8/EC, the Privacy and Electronic Communication (EC Directive) Regulations 2003; and (d) any other legislation in force from time to time in the United Kingdom relating to privacy and/or the processing of Personal Data;

"Data Subject" has the meaning given to that term in the Data Protection Laws;

"Personal Data" has the meaning given to that term in the Data Protection Laws;

"Security Incident" means any accidental or unlawful destruction, loss or alteration of Personal Data, or any unauthorised disclosure of or access to Personal Data.