

## **General Data Protection Regulation (GDPR) — Privacy Statement**

As you are no doubt aware the General Data Protection Regulation (GDPR) came into force in 2018. Accordingly, we attach a copy of our Privacy Statement as regards to how we handle and process your personal data.

If you have any question with regard to this matter, please do not hesitate to contact our Data Protection point of contact, Jacqueline Harcus: [info@brightexpeditions.co.uk](mailto:info@brightexpeditions.co.uk)

Privacy Statement

### **1. PURPOSE OF THIS NOTICE**

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

### **2. ABOUT US**

Bright Expeditions LTD ("Bright Expeditions Ltd", "we", "us", or "our") is an outdoor education company. We are registered in England and Wales as a Limited Company under number 11417268 and our registered office is at Bright Expeditions Ltd, Tax Adept Accountants, Suite B, NBK House, 64a Victoria Road, Burgess Hill, West Sussex, RH15 9LH.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer and a Data Protection Manager. Our Data Protection Manager is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 12 (Contact Us), below.

### **3. HOW WE MAY COLLECT YOUR PERSONAL DATA**

We obtain personal data about you, for example, when:

- You an organisation contracting us on your behalf request a proposal from us in respect of the services we provide;
- Our clients engage us to provide our services and also during the provision of those services;
- You or an organisation contracting us on your behalf engages us to provide our services and also during the provision of those services;

- You an organisation contracting us on your behalf contact us by email, telephone or post (for example when you have a query about our services); or
- From third parties and/or publicly available resources (for example, from the organisation contracting us on your behalf).

## 4.THE KIND OF INFORMATION WE HOLD ABOUT YOU

### Categories of Personal Data

The information below categorises the types of data processing we undertake and the lawful basis we rely on:

Type of Information	Purposes	Legal Basis of Processing
You and/or your child/guardian's personal details (such as you/your child/guardian's name and address, medical and health conditions, dietary requirements or disability, emergency contact details such as next of kin name, address, phone numbers, your faith)	To gain required consent for activities and trips/expeditions	For contractual reasons with our insurance company, DofE, HSE Our legitimate interests in meeting our duty of care to participants For performance of our contract
Names and dates of participation	As part of our organisational procedures in organising activities/trips/expeditions	For contractual reasons with our insurance company, DofE, HSE Our legitimate interests in meeting our duty of care to participants For performance of our contract
Participant's faith, medical, disability information	To ensure instructors can support participants To ensure necessary preparation can be made for participants	For contractual reasons with our insurance company, DofE, HSE Our legitimate interests in meeting our duty of care to participants For performance of our contract
Emergency Contact Details for participants, school and staff such as next of kin, name, address and phone numbers	Contacting next of kin in event of emergency during activities/trips/expeditions	Our legitimate interests in meeting our duty of care to participants For performance of our contract
eDofE participant numbers Information regarding participation in activities	To complete returns to ASL and DofE as required To complete green forms for Wild Country Panels To complete and upload assessor reports onto eDofE	For contractual reasons with our insurance company, DofE, HSE For performance of our contract
Images or Film of participants	To promote our company activities To provide to the contracted organisation for their use	We will not identify the individuals or their personal details in these images or film.
Name, Address and Financial details of the contracting organisation	To enable financial transactions to take place as part of our contact	For contractual reasons with our insurance company, DofE, HSE

		For Tax and VAT purposes
Names, email addresses and phone numbers of the contracting organisation and its staff	As part of our organisational procedures in organising activities/trips/expeditions	For contractual reasons Our legitimate interests in meeting our duty of care to participants For performance of our contract
Expedition, training and assessment records for courses, activities and expeditions	As required by our HSE licence In the event of any claim	For contractual reasons with HSE, DofE and our insurance company Our legitimate interests in meeting our duty of care to participants For performance of our contract
Email transactions between ourselves, enquirers, our contacts, our staff, our contracting organisations and third parties e.g. those we use in the course of our work such as DofE/ASL	As part of our organisational procedures in organising activities/trips/expeditions	For contractual reasons For performance of our contract
Any disclosure by a participant, first aid or 'near miss'	As required by our HSE licence In the event of any claim	For contractual reasons with our insurance company, DofE, HSE Our legitimate interests in meeting our duty of care to participants For performance of our contract
Details of contact we have had with you and/or the contracting organisation in relation to the provision, or the proposed provision, of our services;	For performance of our contract	For performance of our contract
Details of any services you and/or the contracting organisation have received from us	For performance of our contract	For performance of our contract
Our correspondence and communications with you and/or the contracting organisation	For performance of our contract	For performance of our contract
Information about any complaints and enquiries you and/or the contracting organisation make to us	For performance of our contract	For performance of our contract
<b>The Following applies only to Bright Expeditions sub-contractors and freelance staff</b>		
Staff qualifications, contact details (phone number, address email) work history and job titles, work references DBS and criminal activity information, Bank details and documents such as utility bills, Driving Licence, Passport, Next of kin name and contact details Bank details	To ensure that we meet our operating procedures and policies for activities. As part of our licence As part of our due diligence To enable remuneration to staff	For performance of our contract

## 5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We may process your personal data for purposes necessary for the performance of our contract with you or the organisation contracting us on your behalf and our clients and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are a subcontractor, freelancer, supplier or the organisation contracting us on your behalf.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### Situations in which we will use your personal data

We may use your personal data in order to:

- Carry out our obligations arising from any agreements entered into between you, our clients and the organisation contracting us on your behalf (which will most usually be for the provision of our services);
- Carry out our obligations arising from any agreements entered into between you, our clients the organisation contracting us on your behalf (which will most usually be for the provision of our services) or where you may be a subcontractor, freelancer, supplier.
- Provide you or the organisation contracting us on your behalf with information related to our services and our events and activities that you/they request from us or which we feel may interest you and/or the organisation contracting us on your behalf provided you/they have consented to be contacted for such purposes;
- Seek your thoughts and opinions on the services we provide; and
- Notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you or the organisation contracting us on your behalf. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- The requirements of our business and the services provided;
- Any statutory or legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

#### Change of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## 6. DATA SHARING

### Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Please note, however, that where you or the contracting organisation are transmitting information to us over the internet, then given the internet is not a secure medium, we cannot definitely guarantee the security of this information.

We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table in paragraphs 3 and 4 above.

We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to our instructors, insurance company or DofE, The Award Scheme Ltd). However, we disclose only the personal data that is necessary for the third party to deliver the service.

### Which third party service providers process my personal data?

"Third parties" includes third-party service providers and other entities within our group. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, administration services, marketing services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### What about other third parties?

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## 7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

We will not transfer the personal data we collect about you outside of the EEA.

We have put in place measures to ensure that any personal data is treated by those third parties in a way that is consistent with and which respects the Data Protection Legislation that specifies that no data leaves the UK and all processes are carried out on servers maintained and physically located in the UK.

Should you require further information about this or the protective measures we have in place, please contact us using the contact details outlined below.

## 8. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 10. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact Jacquie Harcus - [info@brightexpeditions.co.uk](mailto:info@brightexpeditions.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact Jacquie Harcus – [info@brightexpeditions.co.uk](mailto:info@brightexpeditions.co.uk)

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. CHANGES TO THIS NOTICE

Any changes we may make to our privacy statement in the future will be updated on our website. This privacy statement was last updated on 25 May 2018.

## 12. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email our Data Protection Point of Contact Jacquie Harcus – [info@brightexpeditions.co.uk](mailto:info@brightexpeditions.co.uk)

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SIC  
5AF

Telephone 0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>