

# Privacy policy – Parents & Children

## Hatton Adventure Camps LLP



**Approved by:** Mark Morrey

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## Privacy notice for parents and children

Under data protection law, individuals have a right to be informed about how we use any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **children**.

We, Hatton Adventure Camps LLP (**HAC**) are a Limited Liability Partnership between Hatton Country World and Onside Coaching (Childcare & PE) Ltd. **HAC** are the 'data controller' for the purposes of data protection law.

Our data protection officer is Richard Butler (see 'Contact us' below).

## The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about children includes, but is not restricted to:

- Name
- Date of birth
- Gender
- School information – name, contact details, year group and class
- Details of any medical conditions or special needs
- Details of any medication including dosage
- Safeguarding information
- Parent/carer contact details and contact preferences
- Attendance information at extra-curricular courses or clubs (holiday camps, after-school clubs)
- Details of any injuries or incidents incurred at these courses
- Assessment and performance data

## Why we use this data

We use this data to:

- Help us provide the services to which the child has enlisted
- Protect children's welfare
- Assess the quality of our services
- Support children's specific needs
- Monitor and report on child progress

## Our legal basis for using this data

We only collect and use childrens' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process children' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use children' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using children' personal data overlap, and there may be several grounds which justify our use of this data.

## Collecting this information

While the majority of information we collect about children is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## How we store this data

We will normally keep information relating to children indefinitely, providing that they are currently receiving a service from us whether through their school or parent/carer. Once deemed 'inactive' we will retain the data for a period of 2 years, after which it will be securely deleted with the exception of any incident or injury reports which we are legally obliged to retain for a minimum of 7 years.

## Data sharing

We do not share information about children with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about children with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*

- *The Department for Education*
- *The child's family and representatives*
- *Educators and examining bodies*
- *Our regulator [Ofsted]*
- *Central and local government*
- *Health authorities*
- *Health and social welfare organisations*
- *Police forces, courts, tribunals*

## **Transferring data internationally**

We will not share your data with bodies outside of the European Economic Area.

## **Parents and children' rights regarding personal data**

Individuals have a right to make a '**subject access request**' to gain access to personal information that we hold about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data we hold about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

## **Other rights**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Richard Butler

01926 496 406

[privacy@onsidecoaching.co.uk](mailto:privacy@onsidecoaching.co.uk)

# Privacy policy – [Onside Live System](#)

## Hatton Adventure Camps LLP



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### 1. About Us

This website (<https://hatton.onsidelive.co.uk>) is operated by Hatton Adventure Camps LLP, a Limited Liability Partnership between Hatton Country World and Onside Coaching. Unless stated otherwise, Hatton Adventure Camps LLP is the data controller in respect of all personal data collected on this Website which means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

This Privacy Policy explains what information is collected about you, how it is used, and the steps taken to ensure that it is kept secure. We also explain your rights and how to contact us.

### 2. The information we collect

In order to provide the necessary service, we will obtain details including:

- Contact details of those booking the session and those for each child who will attend the session
- Date of birth for example, where the service you require has age related restrictions or for verification purposes
- Support information, i.e. other information that is relevant to parent / guardian / child's needs such as any allergy information or treatment that may need to be given to help the child at the session
- Gender
- School information – details of school and year group
- Feedback we receive and your interest in Hatton Adventure Camps.

The information will be obtained from this Website, telephone conversations, emails and written and verbal communications and from records of the session.

## Information about other people

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

## IP addresses

In order to understand how users use this Website and our services, we may collect your Internet Protocol addresses (also known as IP addresses). Your IP address is a unique address that computer devices (such as PCs, tablets and smartphones) use to identify themselves and in order to communicate with other devices in the network.

## Cookies

In common with many other website operators, we may use standard technology called 'cookies' on this Website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate this Website on each visit.

Our cookies are used to enable us to develop our Website and to enable you to properly navigate it. We use cookies to collect analytical data which tells us how frequently particular pages are visited and to enable us to determine the most popular areas of this Website. We may also use cookies to track your visits to the website with a view to displaying important messages as and when they become appropriate.

The cookies we use on this Website are as follows:

- Hatton Adventure Camp
  - WebsiteChanges20180302 – this is used to control the initial popup when somebody visits the site to display changes that have occurred since they last logged in
  - A cookie is created to remember the customer's choice with regards to the EU cookie directive
  - Aspessionid\*\*\*\*\* - ASP session cookies are used to remember a visitor's browser type for correct rendering of web pages.
- Google Analytics
  - <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
  - \_\_ga
  - \_\_gid

## Preventing use of cookies

On visiting, our website will give you a choice of whether you are happy with us using cookies or not. If you choose to 'opt in' then the above cookies will be used as normal, whereas if you prefer us not to use cookies then all of the above cookies will be disabled (with the exception of the cookie used to store your preference on this matter). You will be able to change your choice at any time by clicking on the cookie preferences pop-up which will always be visible whilst on our website.

In addition, you can also change your browser to prevent cookies being stored. With experience, you can usually choose to switch off all cookies or to allow only certain 'trusted' sites to place cookies. For further information on cookies and how to switch them off see the Information Commissioner's website at [www.ico.gov.uk](http://www.ico.gov.uk) or visit [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org)

PLEASE NOTE, IF YOU DO TURN COOKIES OFF, THIS WILL LIMIT THE SERVICE THAT WE ARE ABLE TO PROVIDE TO YOU AND MAY AFFECT YOUR USER EXPERIENCE.

### **3. How we will use your information**

All personal information that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection legislation, our Terms and Conditions and this Privacy Policy. We will primarily use the personal information:

- For registration and general administration (including verification and security checking)
- To provide the goods and services you request from us
- To communicate with you in the event that any goods or services requested are unavailable or if there is a query or problem with your requests
- For record keeping purposes
- To carry out market research so that we can improve the goods and services we offer
- For research purposes and to enable us to understand requirements and develop other related courses and services
- To track and analyse activity on this Website
- To create an individual profile for you so that we can enhance your user experience, to understand and respect your preferences and to provide newsletters, SMS and any other details of relevant offers and opportunities where you have agreed to receive them

#### **Consent and lawful processing of personal data**

The legal basis for the collection and processing of your personal data is:

- For administration and programme delivery: that it is necessary to fulfil the contract that you are going to enter into or have entered into with us
- For dealing with medical needs: that you have given your explicit consent
- For direct marketing: that you have given your consent

#### **Disclosing your personal information**

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

#### **Club and instructor use of your personal information**

In order to provide and administer courses and events, we will provide relevant details to the Onside Coaching staff running your session. Onside Staff will also be provided with contact details for each person who is booked for one of their courses / events and also the details of the attendee (if different) and any special needs or medical information that it is important for them to know. We only permit staff to use this information to deal with the administration of the course or event and any medical support purpose. They are not permitted to use it for any other purpose.

#### **Payment information**

The payment card information you provide will only be available to the payment provider (currently Stripe). This will not be available to Hatton Country World, Onside Coaching or any staff, apart from in the case where a booking is made offline (via telephone) and payment is processed

on the customer's behalf. In this case your payment details will be used to process your booking only, after which they will be securely deleted.

## **4. Newsletters and email marketing**

We would like to contact you and/or any person whose information you provide to us to invite you to enjoy other products and services (where you have agreed to us sending an invitation), to provide newsletters, SMS or email and to tell you and/or them about offers and opportunities that are available. Details of how to opt-in to or opt-out of receiving such details of offers are on relevant pages of this Website, in relevant forms you complete and/or in the electronic message you receive.

### **Preferences / Subscribe / Unsubscribe**

You and any other person whose information you have provided to us can change your/their mind about whether you wish to receive details of offers and opportunities at any time by either:

- Unsubscribing using the appropriate link, which is prominently featured in all email communications sent by Hatton Adventure Camps.
- Changing your preference in the 'Your Account' feature on the website

## **5. Security**

Hatton Adventure Camps protects information both online and off-line. The transmission of information, including any personal and payment information, is encrypted and protected using SSL (Secure Sockets Layer). Stored customer information is kept in a secure environment and protected against unauthorised disclosure, use, loss and damage. We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

## **6. Data Retention**

We will normally keep your personal data indefinitely, providing that you are an active customer. Once your account is inactive for a period of 2 years, then all of your personal data will be securely deleted with the exception of any incident or injury reports which we are legally obliged to retain for a minimum of 7 years.

We expect to contact you at least every two years to ensure you are still happy to hear from us according to the preferences you have provided to us.

## **7. Changes to this privacy policy**

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. If we want to make any significant changes in how we will use your personal data we will contact you directly and, if required, seek your consent.

We will ensure our Website has our most up to date policy and suggest that you check this page periodically to review our latest version.

## **8. Updating and correcting information**

You may update or correct your personal information online in 'Your Account' or by contacting us in writing or by email (see the section 'How to contact us' below). Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept

amendments only from the correct person. We encourage you to promptly update your personal information if it changes.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

## 9. Your rights

You have a number of legal rights in respect of your personal data. These include:

- Access. The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them.
- Withdraw consent to direct marketing. You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section 'Updating and correcting your personal data' above for details.
- Withdraw consent to other processing. Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- Rectification. If you consider any of your personal data is inaccurate, you can correct it yourself or ask us to do it for you (see section 'Updating and correcting your personal data' above for details).
- Restriction. In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.

## 10. How to contact us

Email	<a href="mailto:privacy@onsidecoaching.co.uk">privacy@onsidecoaching.co.uk</a>
Mail	Data Protection Officer Onside Coaching (Childcare & PE) Ltd Woodcote House The Warwickshire Golf & Country Club Leek Wootton Warwickshire CV35 7QT
Phone	01926 496 406
Data Protection Executive	<a href="mailto:privacy@onsidecoaching.co.uk">privacy@onsidecoaching.co.uk</a>