# Privacy Notice

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## Introduction

The Lakeland Climbing Company Ltd [trading as Kendal Wall Climbing Centre, PrestonWall Climbing Centre, LancasterWall Climbing Centre, HarroWall Climbing Centre, VauxWest Climbing Centre, VauxEast Climbing Centre, RavensWall Climbing Centre, CroyWall Climbing Centre, CanaryWall Climbing Centre, BethWall Green Climbing Centre, and EustonWall Climbing Centre] (the "Wall", "we", "us") (registered company number [03006915]) is committed to protecting your privacy.

At all times, we aim to respect any personal information you share with us, or that we receive from others, and keep it safe. This Privacy Notice ("Notice") sets out our data processing practices and your rights and options regarding how your personal information is used and collected.

This Notice contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal information. Providing your personal information to us is voluntary. However, without providing your personal information, your use of our services or your interactions with us may be impaired. For example, you may be unable to sign up as a member or make an online booking.

## When do we collect your personal information?

### 1. When you give it to us directly

For example, personal information that you submit through our website, such as pre-registering on our database, or by making a booking to use our facilities, or via our tablets at reception, or signing up for our email newsletter, or personal information that you give to us when you communicate with us by email, phone or letter.

### 2. When we obtain it indirectly

For example, your personal information may be shared with us by third parties, including the Association of Climbing Walls (Britain) Limited ("ABC"), an organisation established to promote safe management practices in climbing walls of which we are a member, third-party service providers, analytics providers, and search information providers. To the extent we have not already done so, we will notify you when we receive personal information about you from them and explain how and why we intend to use that information.

### 3. When it is available publicly

Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (for example, when you choose to interact with us via Facebook, Instagram, Twitter and Google).

### 4. When you visit our website

When you visit our website, we automatically collect the following types of personal information:

(a) Technical information, including the internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
(b) Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.
(c) We collect and use your personal information by using cookies on our website – https://londonclimbingcentres.co.uk.
(d) In general, we may combine your personal information from these different sources set out in a-c above, for the purposes set out in this Notice.

## What personal information do we use?

We may collect, store and otherwise process the following kinds of personal information:

(a) your name and contact details, including postal address, telephone number, email address, emergency contact details and, where applicable, social media identity;
(b) your date of birth and gender;
(c) your financial information, such as bank details and/ or credit/ debit card details,
(d) information about your computer/ mobile device and your visits to and use of this website, including, for example, your IP address and geographical location;
(e) personal descriptions and photographs;
(f) details of your qualifications/ experience;
(g) CCTV recordings;
(h) Information relating to medical emergencies or accidents on our premises;
(i) Medical information shared by you where you feel it is important for us to know about a certain medical condition when you are using our centres; and/or
(j) Photographs taken during climbing competitions within our centres and/ or any other personal information which we obtain as above.

## Do we process special categories of data?

The EU General Data Protection Regulation ("GDPR") recognises certain categories of personal information as sensitive and therefore requiring more protection, for example, information about your health, ethnicity and religious beliefs.

In certain situations, the Wall may collect and/or use these special categories of data (for example, information on climbers' medical conditions relevant to their use of our facilities). We will only process these special categories of data if there is a valid reason and the GDPR permits it.

## How and why will we use your personal information?

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

(a) to register you as a member of the Wall;
(b) to allow you to make a booking to use our facilities;
(c) to otherwise provide you with services, products or information you have requested;
(d) to give more information about our work, services or activities (where necessary, only where you have provided your consent to receive such information);
(e) to assist you with certification schemes, such as NICAS;
(f) to answer your questions/ requests and communicate with you in general;
(g) to allow you to apply for a job or volunteer role with us;
(h) to manage relationships with our partners and service providers;
(i) to analyse and improve our work, services, activities, products or information (including our website), or for our internal records;
(j) to keep our facilities safe and secure;
(k) to run/administer the activities of the Wall, including our website, and ensure that content is presented most effectively for you and for your device;
(l) to audit and/ or administer our accounts;
(m) to satisfy legal obligations which are binding on us, for example, in relation to regulatory, Government and/or law enforcement bodies with whom we may work (for example, requirements relating to the payment of tax or anti-money laundering);
(n) for the prevention of fraud or misuse of services; and/or
(o) for the establishment, defence and/ or enforcement of legal claims.

## Lawful bases

The GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

(a) Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you email newsletters, or to collect special categories of your personal information. (Special categories of personal information are explained above.)

(b) Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).
(c) Where necessary for the performance of a contract to which you are a party or to take steps at your request before entering a contract (for example, to provide you access to our facilities in return for your booking fee).
(d) Where it is in your/someone else's vital interests (for example, in case of a medical emergency suffered by a climber).
(e) Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights as an individual).

In broad terms, our "legitimate interests" refer to running the Wall as a commercial entity and ensuring the best possible user experience.

When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and on your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to do so by law).

## Communications for marketing/promotional purposes

We may use your contact details to provide you with information about our work, events, services and/or activities that we consider may be of interest to you (for example, services you previously used or events involving our or other walls' facilities).

Where we do this via email, SMS or telephone (where you are registered with the Telephone Preference Service), we will not do so without your prior consent (unless permitted by applicable law).

If you have provided us with your consent previously but do not wish to be contacted by us about our work, events, services and/or activities in the future, please let us know by email at vauxwall@londonclimbingcentres.co.uk. You can opt out of receiving emails from the Wall at any time by clicking the "unsubscribe" link at the bottom of our emails.

## Children's personal information

When we process children's personal information, we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

## How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected; or six years after a junior (under 18 years of age when registered) turns 18.

However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it, or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time. If you request no further contact from us, we may keep some basic information about you on our suppression list to comply with your request and avoid sending you unwanted materials in the future.

## Will we share your personal information?

We do not share, sell or rent your personal information to third parties for marketing purposes.

However, in general, we may disclose your personal information to selected third parties to achieve the purposes set out in this Notice.

These parties may include (but are not limited to):

(a) Climbing Centres owned and operated by the Lakeland Climbing Centre Limited;
(b) the ABC and the ABC Training Trust;
(c) local government agencies;
(d) funding bodies such as Sport England and NGB;
(e) awarding bodies such as Mountain Training;
(f) other members of the ABC;
(g) healthcare professionals;
(h) providers of kit and equipment;
(i) suppliers and sub-contractors for the performance of any contract we enter into with them, for example, IT service providers such as website hosts, payment providers or cloud storage providers;
(j) professional service providers such as accountants and lawyers;
(k) parties assisting us with research to monitor the impact/effectiveness of our work, events, services and activities; and

(l) regulatory authorities, such as tax authorities;

In particular, we reserve the right to disclose your personal information to third parties:

(a) If we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
(b) If substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
(c) If we are under any legal or regulatory duty to do so; and/or to protect the rights, property or safety of the Wall, its personnel, users, visitors or others.

## Security/storage of and access to your personal information

The Wall is 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 your information.

Your personal information is accessible only by appropriately trained staff, volunteers, and contractors, and is stored on secure servers that have features to prevent unauthorised access.

## International data transfers

Given that we are a UK-based organisation, we will normally only transfer your personal information within the European Economic Area ("EEA"), where all countries have data protection laws equivalent to those under the GDPR.

However, because we may sometimes use agencies and/or suppliers to process personal information on our behalf, personal information we collect from you may be transferred to and stored in a location outside the EEA, for example, the United States.

Please note that some countries outside the EEA have lower standards of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal data is transferred, stored and/or otherwise processed outside the EEA in a country that does not offer an equivalent standard of protection to the EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses which the European Commission has approved) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Notice. If you have any questions about the transfer of your personal information, please get in touch with us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure. However, once we have received your personal information, we will implement strict procedures and security measures to attempt to prevent unauthorised access.

## Exercising your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

(a) Right of access – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the requested personal information and that we have successfully confirmed your identity, we will provide it to you, subject to any applicable exemptions.

(b) Right of erasure – at your request, we will delete your personal information from our records as far as we are required to do so. In many cases, we would propose suppressing further communications with you rather than deleting them.

(c) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal data we hold about you if you are unsure whether it is accurate/up to date.

(d) Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.

(e) Right to object – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests basis, (ii) using your personal information for direct marketing, or (iii) using your information for statistical purposes.

(f) Right to data portability – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request before entering into a contract, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.

(g) Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is

necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which the Wall is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

Please note that some of these rights only apply in limited circumstances. For more information, please contact us using the details below.

We encourage you to raise any concerns or complaints about how we use your personal information by contacting us using the details provided below. You are further entitled to make a complaint to the Information Commissioner's Office – www.ico.org.uk.

## Changes to this Notice

We may update this Notice from time to time. We will notify you of significant changes by contacting you directly, where reasonably possible, and by posting an update notice on our website.

## Links and third parties

We link our website directly to other sites. This Notice does not cover external websites, and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

## How to contact us

Please let us know if you have any questions or concerns about this Notice or how the Wall processes your personal information by contacting us at hr@lakelandclimbingcentre.co.uk.