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## Data Protection Policy

We have a legal responsibility when receiving any personal details from any client. This comes under GDPR (General Data Protection Regulations) brought in in 2018 and is an enforced throughout Europe.

The authority in the UK who oversee this are the ICO (Information Commissioners Office).

Crag 2 Mountain Ltd are Registered with the ICO see Appendix A.

### What are the GDPR requirements?

"In order for processing to be lawful, personal data should be processed on the basis of the consent of the data subject concerned or some other legitimate basis," In other words, consent is just one of the legal bases you can use to justify your collection, handling, and/or storage of people's personal data.

### You can collect and process data if....

- Processing is necessary to satisfy a contract to which the data subject is a party.
- You need to process the data to comply with a legal obligation.
- You need to process the data to save somebody's life.
- Processing is necessary to perform a task in the public interest or to carry out some official function.
- You have a legitimate interest to process someone's personal data. This is the most flexible lawful basis, though the "fundamental rights and freedoms of the data subject" always override your interests, especially if it's a child's data.

### GDPR Requirements - Five high-priority actions

- 1) Determine your role under the GDPR.
- 2) Appoint a Data Protection Officer.
- 3) Demonstrate accountability in all processing activities.
- 4) Check cross-border data flows.
- 5) Prepare for data subjects exercising their rights.

Your roles as a **Freelancers/Sub-Contractor** is to protect, not share and then destroy data once it is no longer necessary. Georgia Thomas is the Data Protection officer and will manage all Data.

We are all accountable and must fulfil our role in protecting personal details. Information will be electronic in the form of a digital Consent Form, or emailed. This must have limited access and must be destroyed when it is no longer necessary to store it.

Anyone who has shared personal data with Crag 2 Mountain Ltd has the right to ask for information on what details have been stored, how long it will be stored, what the purpose of collection is and the right to ask for data to be terminated.

[www.crag2mountain.co.uk](http://www.crag2mountain.co.uk)

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Any forwarded details via email must be immediately deleted on completion of any course, or delete once the details are no longer required IE after completing an Accident Form.

**There are further details below that explain our roles.**

There are two types of information, these are **Basic** and **Advanced DATA**.

Examples are lists here:

- **Basic** DATA includes Name, Address, Email, NOK, Medical History for example.
- **Advanced** DATA includes Sexual Orientation, Religion, Political views for example.

Crag 2 Mountain Ltd will ever only ask for Basic data unless advanced information is required in regard to a safety issue. IE religious dress.

To comply with DATA Protection regulations the Crag 2 Mountain Ltd Consent Form now explains:

- **Why** personal data is collected, if and when any **3rd Parties** will receive it,
- **How Long** it will be stored for, and **Their Rights** to know what information is stored and why.
- **Why** Data is collected so we have correct personal details for qualifications, medical conditions for safety, contact details for late arrivals and NOK details in case of emergency.
- **3rd Parties** This information will only be shared with instructors working on their course, or medical services if required.
- **How Long** Any personal data will be destroyed on completion of a course with the exception of where an incident or accident has occurred where these details may need to be used at a later date. This will be held for 3 years for any adult and for 3 years after a child's 18<sup>th</sup> birthday.
- **Their Rights** All clients have the right to request what personal information Crag 2 Mountain Ltd holds on them, how long it will be held and the right to "Being Forgotten".

Any questions should be referred to the policy officer.

Policy Name	DATA Protection Policy		
Written on	01/07/2021	Review date	01/07/2022
Written by	Georgia Thomas		

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2 of 3



## Appendix A

	<p>Upholding information rights</p> <p>Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF T. 0303 123 1113 F. 01625 524510 www.ico.org.uk</p>
<h3>Certificate</h3>	
Organisation Name:	
<b>Crag 2 Mountain Ltd</b>	
Reference number:	
<b>ZA788817</b>	
Tier:	
<b>Tier 1</b>	
Start date:	
<b>17 September 2020</b>	
End date:	
<b>16 September 2021</b>	
<b>Data Protection Officer</b>	
<b>Title:</b>	Mrs
<b>Name:</b>	Georgia Thomas
<b>Address:</b>	6 Bellever Close Princetown Yelverton PL20 6RT
<b>Email address:</b>	info@crag2mountain.co.uk
<b>Telephone number:</b>	01822660365
<b>Publish Name:</b>	Yes
<b>Publish Contact Details:</b>	Yes

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3 of 3

