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## Executive Summary

Readyclimb, as a Trading Style of Crown Endeavours Limited is committed to keeping your personal information safe and secure. We are also committed to operating our business in a fair and ethical nature. Every person that works for ready2climb has a legal duty to keep your information secure and confidential.

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 policy document contains important information about your rights to privacy, our data processing practices and your rights and options regarding ways in which your data is collected, stored and used. Please read this document carefully to fully understand how we use your personal information.

The provision of your personal information to us is completely voluntary. However, without providing us with your personal information, your use of our services and activities may be impaired. For example, you may not be able to use our online booking services or register to climb unsupervised at ready2climb.

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## 1 General Data Protection Regulations (GDPR)

The General Data Protection Regulations (GDPR) came into effect on the 25<sup>th</sup> May 2018, replacing the Data Protection Act. The new rules mean that we, like all other businesses in the UK, are required by law to identify clearly how we handle your personal information.

This Privacy, Fair Processing and Cancellation Policy identifies how we acquire, use and securely store your personal information. The scope of information applies to all customers of ready2climb and individuals engaged in the provision of adventurous activities at ready2climb.

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## 2 Definitions

All references to **we, our, us** in this document refer to Crown Endeavours Limited registered company 3916880, trading as ready2climb.

All references to **you, your, their, they** in this document refer to customers and users of the activities and services provided by ready2climb.

All references to **personal data, personal information, data** in this document refer to your Personally Identifiable Information (PII) acquired, used and stored by us

References to the term **Responsible Adult** in this document refer to a person of sound mind over the age of 18 who is responsible for their own and/or other peoples' booking(s) of activities at ready2climb. This person may be a parent, a carer, a legal guardian or a person who is acting in loco parentis – such as a teacher or a Scout or Brownie leader

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## 3 Document revisions

We reserve the right to update this document as and when we feel appropriate. The latest version (even if an unreleased draft version) is held at reception at ready2climb where it is always available for inspection. The version on the website will be the latest **issued** version of the document which should be considered "For Reference Only." When you book on-line with ready2climb, you are forming a contract between you and ready2climb, you acknowledge that you have read and understood this document as part of your informed consent. That

acknowledgement, as well as the version of the document made available to you is appended to your on-line booking.

## 4 About us

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Crown Endeavours Limited was incorporated in 2000 and has been continuously trading since that date. We run a number of businesses, one of which is ready2climb.

Ready2climb is a Trading Style which started business in 2008 with a mobile climbing wall and other mobile activities. We opened the ready2climb climbing centre in the summer of 2013.

Ready2climb is a multi-use, multi-activity centre that offers auto-belay protected fun climbing sessions as well as conventional climbing for independent (unsupervised) competent climbers, course delegates, club users and fitness participants. We deliver our products and services to the general public, school and youth groups, corporate customers, uniformed organisations and other groups.

As a part of this range of activities, we offer catered birthday parties, special concessionary rates for youth groups and uniformed organisations and a range of additional activities including teambuilding, abseiling, indoor caving, minigolf and a Bouncy Truck inflatable.

Away from the centre, we provide a wide range of adventurous activities including rock climbing, hill walking, mountaineering, skiing, caving, via ferrata, canoeing and cycling using a combination of in-house instructors and external providers as required for the activity.

## 5 About our customers

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Our customers access and use our facilities in a variety of ways depending on a number of factors, including age and technical ability. This includes, but is not limited to: participation in a fun climbing session, independent, unsupervised use of our conventional climbing facilities or participation in a range of other activities as a member of the public or as a member of a specific user group (school, uniformed organisation, corporate customer, etc.).

Customers naturally provide us with a range of information when they first make contact by any remote means – whether this be by telephone, e-mail or social media contact.

Customers and prospective customers also provide us with information when browsing our website [www.ready2climb.co.uk](http://www.ready2climb.co.uk)

## 6 How we collect personal information about you

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### 6.1 When you provide it directly to a staff member or a ready2climb process

If you engage in a conversation with a member of staff and enquire about an activity, e-mail us, message us via Social media, or book an activity using our on-line booking system, we will collect sufficient information to enable us to satisfy your enquiry. Importantly, we will only collect the information that is necessary, nothing more.

**OUR COMMITMENT:** We will not collect information that we do not need

The information will vary based on your enquiry and subsequent activity that you engage in. For example, for public fun climbing sessions, we only need the name and age (if U18 or a Vulnerable Person) of each participant and any details of any medical conditions that you deem to be appropriate to the activity being undertaken. To enable contact between ready2climb and the organising customer, we will also take your contact details, including telephone number, e-mail address and social media profile details. Meanwhile, for winter mountaineering trips to Scotland, we need much more information, including previous technical knowledge and experience, Next of Kin information, dietary requirements and a variety of contact methods.

This data may be collected in a variety of means, such as, but not limited to a form (electronic or paper), e-mail or notes taken by a member of staff

## 6.2 Via CCTV

Certain areas of ready2climb are more vulnerable to inappropriate behaviour or criminal intent. These areas are covered by a continuously recording CCTV system. The CCTV is there to ensure the safety of all at ready2climb, whether they be staff, customers or spectators.

## 6.3 When you visit our website

Our website, [www.ready2climb.co.uk](http://www.ready2climb.co.uk) uses a variety of tools to record a range of information about your visit. This includes the pages that you have visited, your ISP, your location (as determined by your ISP), your IP address (which is usually dynamic and changes regularly) your device(s) and the Operating System(s) and browser(s) being used.

## 6.4 When we obtain it indirectly

We may receive information about you from our partners, including our bank and on-line payment gateway provider or from visiting instructors who you have engaged with outside of ready2climb.

We will only be given this information if you have given your permission for them to do so.

## 6.5 When we have to intervene in a safety incident

Under certain circumstances, we may have to intervene in an incident to keep our customers safe. In the context of a fun climbing session, this may be a person who climbs without being clipped in or suffers a personal injury resulting in the use of first aid practices while in the context of conventional climbing where a person has failed to tie in correctly or use a belay device correctly. In the event of such an intervention, we will record sufficient information to enable us to manage the situation. This may be the writing of an Accident Form, a RIDDOR notification for the Health and Safety Executive or the creation of an intervention note on a customer's profile.

## 6.6 Via social media

If you engage with us via social media, we will collect information based on your personal privacy settings within your chosen platform and the information we need to satisfy your enquiry.

## 6.7 Special case – Vulnerable Persons over the age of 18

We are proud of the work that we conduct with a wide range of vulnerable persons and we aim to collect the bare minimum of information about vulnerable persons over the age of 18 as we realise that vulnerable persons have little control of who, why and what information they divulge and we respect that.

## 6.8 Spectators

Other than day to day conversation, we rarely collect any information from spectators. If an enquiry is made about an activity, then the conditions outlined above for customers apply to spectators.

## 6.9 Public wi-fi

We offer a public wi-fi service to our customers. This is offered by British Telecom (BT) using their "Guest Wi-fi" service. We have no control over the data that is collected by BT.

# 7 What information do we use?

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We may collect, store and use the following personal information, based on the activities being undertaken:

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- a) Your name and contact details, including postal address, telephone number(s), e-mail address, social media profile information
- b) Your date of birth and gender
- c) Financial information, such as bank and/or debit / credit card details
- d) Information about your computer / mobile device and your visits to our websites including your IP address and ISP determined location
- e) Personal descriptions and photographs as may be required to identify you in our Customer Relationship Management (CRM) database
- f) Details of qualifications, additional training and experience that are relevant to your use of ready2climb facilities, especially if you are an external instructor making use of our facilities for your customers
- g) Any medical information where you feel it is appropriate to inform us of a medical condition where we may need to take special precautions to ensure that you stay safe while using our facilities
- h) Under certain circumstances, we may use information classified as “Special Category” (ethnicity, disability, medical conditions) under GDPR if your use of ready2climb cannot be achieved safely without our processing of such data
- i) Under certain circumstances, we may need to use the recorded CCTV imagery to assist Police and other statutory bodies in their investigations into criminal or inappropriate activity

## 8 How we use your personal information

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We use your information to help us deliver a range of activities under the banner of ready2climb either at the ready2climb centre or outside at a variety of locations. This includes, but is not limited to the following:

- a) To register you as an independent (unsupervised) climber so that you can use our facilities, register you on a training course or become a member of our clubs as arranged from time to time.
- b) To allow you to make a booking for use in our fun climbing sessions or associated activities such as birthday parties
- c) To administer bookings for external instructors to bring their own groups to use our facilities
- d) To provide further information about our work, services and activities where you have provided your consent to receive such information from us
- e) To assist you with registration on accredited training and assessment schemes such as those run by Mountain Training or Cycling UK
- f) To communicate with you on a day to day basis using channels of communication that you are comfortable with
- g) To enable you to apply for a job or volunteer with us
- h) To register you on events that we may run from time to time
- i) To manage relationships with our external partners and service providers, including external instructors and our online booking ([bookwhen.com](https://bookwhen.com)), card payment provider ([clover.com](https://clover.com)) and online payment provider ([stripe.com](https://stripe.com))
- j) To analyse our performance so that we can learn from incidents and improve our relationships with customers
- k) To keep our facilities safe and secure
- l) To manage incidents, such as accident or near misses and to communicate with third parties as required (e.g. Health & Safety Executive, Local Authorities, Police and Emergency Services)
- m) To run and administer the activities offered by ready2climb so that the facilities and online media content are offered to customers in an effective manner
- n) To audit or administer our financial services

- o) To prevent fraud or misuse of our services and facilities
- p) For the establishment, defence or witnessing of legal claims made against ready2climb or other customers
- q) To satisfy our legal obligations
- r) To record your consent for participation in activities offered by ready2climb

## 9 Our justification for using your information

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GDPR requires all businesses to identify the lawful basis for the collection, use and storage of personal information. Ready2climb consider the following bases to be relevant:

- a) Where you have provided your consent for us to use your personal information in a prescribed way (for example, we may seek your consent to use your personal information to subscribe you to a newsletter)
- b) Where necessary to enable us to comply with legal obligations placed upon us by regulation
- c) Where necessary to enable the satisfactory completion of a contract formed between you and us
- d) Where necessary to protect your vital interests (for example in an emergency situation)
- e) Where there is a legitimate reason for us to use your information that may not be explicitly identified in this policy

The GDPR enables businesses to collect and process your personal information if it is reasonable 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).

For the context of ready2climb, “legitimate interests” means the information required to enable us to deliver our facilities as a commercial entity and ensuring that customers enjoy the best possible user experience using our facilities and/or our members of staff.

**OUR COMMITMENT:** When we process your personal information to achieve our legitimate interests, we will consider and balance and potential impact on you (positive or negative) against your rights under data protection laws. We will not use your personal information where our interests are overridden by the potential impact on you (e.g. where you may consider our use of your information intrusive) unless we are otherwise required or permitted to do so by law

## 10 Children’s and Vulnerable Person’s information

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We process children’s and vulnerable persons over the age of 18 with great care. We minimise the information acquired to be the minimum that we need to enable our business to operate within the safe boundaries outlined in law and /or our business ethics.

Under all circumstances, we will record children’s or vulnerable person’s information with the express consent of a Responsible Adult such as a parent, guardian or person working in loco parentis (e.g. Group Leader, Carer, teacher).

**OUR COMMITMENT:** We will always have safeguards in place to ensure that children’s and vulnerable person’s information is handled with due care.

## 11 How long do we keep your personal information?

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The duration that we keep your information depends on the type of information collected. We will store the information safely in an appropriate manner for an appropriate length of time as detailed below

### 11.1 Website traffic details

Personal details, such as IP address, location, pages visited by you, system information (OS, browsers, platforms) are stored and used to help us determine how we can best serve our customers.

Generic non-personal data such as the number of pages visited by all browsers is retained for life

### 11.2 Consent and medical information

Consent forms and medical information forms are kept for a time period depending on the person identified on the consent form.

If the person identified is a child, but no impairment or disability is outlined, then the consent form is kept until the child is 21 years plus 3 months.

If the person identified is a vulnerable person or a child where an impairment or disability is identified, then the consent form is kept until the person is 25 years plus 3 months.

If the person is identified is an adult, we will keep the information for as long as we need to ensure that our business interests are protected. This is generally 6 years.

### 11.3 Other information

We will keep your personal data for only as long as we need. We have a legal requirement to store e-mails that determine a business decision (e.g. a booking or information about a course that contributes towards 'informed consent') for a minimum of 7 years.

We keep electronic copies of 'merchant copy' credit / debit receipts for an indefinite period. We do not produce paper receipts. This means that there is no chance for your card information to be viewed by an inappropriate person (so, for example, an instructor working with you will **not** have a card receipt stapled to your consent form).

If we come across a 'customer copy' credit / debit card receipt (e.g. left on a table when we clear the table), it is destroyed immediately. We prefer that customer card receipts are e-mailed or text'ed to you, but this is your choice.

## 12 Cessation of personal information being held

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You have rights in law for your information to be removed from our systems unless we can demonstrate a valid reason for retaining it (such as consent forms). You can ask to be removed from our databases at any time. We would ordinarily retain some basic contact information in a suppression list to help ensure that you are not sent unwanted or unsolicited materials

## 13 How we share your personal information

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**OUR COMMITMENT:** We do not and will never share, rent or sell your personal information with third parties for marketing purposes.

We may share your information with selected third parties to help us satisfy our business aims. These parties include, but are not limited to:

- a) Any climbing industry bodies that may collect incident and accident statistics
  - b) Any government agencies or departments that can justifiably request your information
  - c) Generic information may be shared with funding bodies such as Sport England or the National Lottery
  - d) Industry Awarding bodies such as Mountain Training or Cycling UK
  - e) Healthcare professionals who can justify a need for your information to protect your vital interests
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- f) Industry partner bodies such as the National Governing Body who can justify the use of your information
- g) Suppliers and sub-contractors that we engage with for the benefit of our business needs. In these circumstances, we retain the legal obligation for the care of your information
- h) Professional Services providers such as accountants, solicitors and lawyers
- i) Third parties assisting us with research to enable us to improve our services and facilities
- j) Regulatory authorities, such as HMRC
- k) Any third party that is necessary to protect the rights, the property or the safety of ready2climb, its parent organisation, its directors, staff, users, visitors and any other person associated in some way with the business

In particular, if we sell any part of the business or assets associated with the business, then your personal information is considered as part of those assets and may therefore form part of the sale negotiations.

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

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Ready2climb is committed to keeping your personal information safe and secure. We have appropriate and proportionate security policies as well as organisational and technical measures in place to protect your information. Your personal information is only accessible to those persons who need access to it – the “need to know” principle as outlined for specific circumstances below.

### 14.1 Credit and debit card information

#### 14.1.1 ‘Person to person’ transaction

If you pay for a product or service at our reception and use the card terminal for the transaction, this is classified as a “Customer Present” transaction and is tightly controlled by the industry body set up by Visa and Mastercard. Regardless of whether a physical card is inserted, operated contactless or an electronic device (phone, watch, etc.) is used, the same process occurs. The terminal is connected via a secure data link to a base station, which in turn is connected via a wired connection straight to the Payment Gateway provider which is currently Worldpay. Ready2climb does not (and is not permitted to do so by law!) does not collect any personal information.

An electronic ‘merchant copy’ receipt is generated for all transactions. This includes your full name and card details, but does not include the security code from the signature strip on the reverse of the card.

A paper ‘customer copy’ may also be generated. This contains sufficient information about the transaction to enable you to track your expenditure, but does not contain sufficient information for your card account details to be used fraudulently if you lose the receipt.

#### 14.1.2 Over the telephone

If we take payment over the telephone, we may use 1 of three methods depending on the transaction. The first is via Paypal with a product called “Paypal here” which runs on mobile devices as an app. We enter your card and e-mail details into the app and Paypal will send you the receipt. No paper details are created for either merchant or customer.

The second option is to use our online booking payment provider, Stripe. We open a payment window on a PC or mobile device, enter your card details and e-mail address and Stripe will send you the receipt. No paper details are created for either merchant or customer.

The third option is to use our card payment provider, Clover. This uses a specifically configured tablet which is connected over encrypted wi-fi to the network using a protocol called “Customer Not Present”. We enter your card details, as well as any other details that the terminal may request (such as the billing address) and Clover

completes the transaction. An electronic Merchant receipts is generated. A customer receipt can be generated if requested.

**OUR COMMITMENT:** When we complete a financial transaction over the telephone, we will **NEVER** write down your card information. We will never “read back” your card details to you.

### 14.1.3 On-line payments

When you book with ready2climb on-line, you are using our booking provider Bookwhen ([www.bookwhen.com](http://www.bookwhen.com)). We have integrated Stripe ([www.stripe.com](http://www.stripe.com)) as a payment gateway into Bookwhen. Bookwhen and Stripe use highly encrypted servers and transmission technologies to ensure that your information is safe from the moment it is on your screen to the moment that the money is debited from your bank account. Ready2climb and Bookwhen do not witness, store, move or manipulate your financial details in any manner, shape or form. The way in which your financial details are manipulated is tightly regulated by the industry body which was set up and is run and funded by Visa, Mastercard, American Express and others. For an online payment, Bookwhen will send you a confirmation e-mail for the booking and Stripe will send you an electronically generated receipt.

## 14.2 Booking Details

### 14.2.1 On-line Booking

When you book on-line or otherwise register with ready2climb on-line, your personal details are managed by our on-line booking and Customer Relationship Management (CRM) databased. We use Bookwhen ([www.bookwhen.com](http://www.bookwhen.com)) which is a UK based business. Access to your information is controlled by user access rights, so only “admin” staff have access to your personal information. Redacted forms are exported from the database to display only the information required for the activity being undertaken. As an example, for a fun climbing session, the climbing instructors only need to know the climbers’ names and ages, as well as any medical conditions that may be pertinent – they don’t need to know addresses, telephone numbers, marital status and e-mail addresses so any additional information would not be appropriate.

### 14.2.2 Manual Booking

When you book via e-mail, telephone, social media or simply ‘drop in’ to visit us at reception, we will offer to make a booking for you, or provide you with sufficient assistance to enable you to manage your own booking.

If we make a booking on your behalf, we will enter only sufficient information that we need to enable the booking to proceed.

## 15 Exercising your rights

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In the UK, all consumers have always had very good rights, but GDPR requires a change in emphasis from being business oriented to consumer oriented. Rather than “opt out” clauses, businesses should now offer “opt in” clauses where the default is no, or little information is stored and used. As a consumer, you have certain rights:

### 15.1 Right of access

You are entitled to know what information is held about you. We need to verify your identity and ensure that you are entitled to witness the information and we will then share our information with you.

### 15.2 Right of erasure

At your request, we will delete your personal information, subject to any legal or obligatory requirements placed upon us (such as consent forms or credit card receipts) to the extent that we are required to do so. In many

cases, we would suggest suppressing your data (effectively archiving it) to prevent future contact rather than deleting it.

### 15.3 Right of rectification

If you believe your information to be inappropriate or inaccurate, you can ask for it to be changed. If you change address, telephone number or e-mail address, then these can be updated for you. If you consider that a safety intervention note has been unfairly written, then this will need specific involvement from the instructor(s) and other climbers involved with the incident.

### 15.4 Right to object

If we are using your personal information for our own marketing, you have the right to object about that marketing.

**OUR COMMITMENT:** We will not use your personal information for marketing purposes unless you have provided your explicit consent to do so – you “opt in.”

### 15.5 Right to data portability

You have a right to view your personal information in a similar format to how we hold it. If we hold paper based information, we can either copy it or you can take a photo of it – if we scan or photograph it ourselves, it becomes electronic communication

If your information is held in electronic format, such as on our CRM database or an electronic form, then you are entitled to this information in a suitable machine readable format.

### 15.6 Rights related to automated decision making

You have the right **not** to be subject to a decision based solely on automated processing of your information which produces any legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into / fulfil a contract between you and ready2climb; (ii) is authorised by EU or member state law to which ready2climb is subject; or (iii) is based on your explicit consent

### 15.7 Limitations and caveats

Some of the rights identified above only apply in specific circumstances. Therefore, we ask that first contact for all personal information issues is made via our nominated Data Protection Officer. You can also make a complaint to the Information Commissioners Office (ICO). See their website [www.ico.org.uk](http://www.ico.org.uk) for more details.

## 16 Contact information

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Ready2climb, and its parent organisation, Crown Endeavours Limited are family businesses working with very small quantities of personal information. As a consequence, we are not required to register with the ICO or employ an individual with specific responsibilities for data protection – the so called Data Protection Officer. Instead, please contact one of the Directors as identified below:

Ian Henson: [ian.henson@ready2climb.co.uk](mailto:ian.henson@ready2climb.co.uk)

Address: Unit 10, Buckland Road, Pen Mill Trading Estate, Yeovil, Somerset, BA21 5EA

Telephone: 01935 413675