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## **RHINO BOULDER'S PRIVACY POLICY**

### **Our contact details**

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Address: Units 6 & 7, The Mall, Bromley, BR1 1TR

Phone Number: 02080508720

E-mail: [info@rhinoboulder.co.uk](mailto:info@rhinoboulder.co.uk)

### **Types of personal information we collect**

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics including:
  - Name
  - Date of birth
  - Address
  - Email address
  - Phone number
  - Photograph of face
- Financial information, such as bank details and/or credit/debit card details, account holder name, sort code and account number
- Details of your qualifications/experience, your position in an organisation, and information related to the work that you do there
- CCTV recordings
- Images for marketing or promotional purposes
- Information regarding medical emergencies or accidents on our premises
- Medical information shared by you where you feel it is relevant
- Prior and alleged offences
- When you visit our website, we automatically collect the following types of personal information:
  - 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.
  - 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.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Registering as a climber or supervisor at our facility
- Setting up memberships or other recurring payments
- Applying for work opportunities
- To receive marketing communications including emails and SMS (where necessary, and only where you have provided your consent to receive such information)
- For certification schemes, such as NICAS
- To provide you with services, products or information you have requested
- To register and administer your participation in events that we run
- 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)
- To carry out DBS checks as part of staff inductions
- For the prevention of fraud or misuse of services; and/or for the establishment, defence and/or enforcement of legal claims

## **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 or religious beliefs.

In certain situations we may collect and/or use these special categories of data (for example, information on any medical conditions relevant to your use of our facilities). We will only process these special categories of data if there is a valid reason for doing so and where the GDPR allows us to do so.

## **Lawful bases**

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent. For example if you opt in to receive our marketing communications or join a waiting list. You are able to remove your consent at any time. You can do this by contacting [info@rhinoboulder.co.uk](mailto:info@rhinoboulder.co.uk)**

**(b) We have a legal obligation. For example where we are obliged to share your personal information with regulatory bodies which govern our work and services**

**(c) Contractual purpose. For example to provide access to our climbing facilities in return for your entry payment**

**(d) We have a vital interest. For example in case of a medical emergency suffered by a climber**

**(e) We have a legitimate interest.**

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" means the interests of operating our climbing facilities as a commercial entity and creating the best possible experience of our business. For example this includes optimising our website for the kinds of web traffic we receive, or using feedback to develop our product offerings.

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 by law).

### **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 in order to achieve the purposes set out in this Notice. We may use information such as photos or videos taken on our premises for marketing or promotional purposes.

When signing up for a membership at Rhino Boulder, you will also be enrolled in the Independent Climbing Wall Collective (ICWC) — a not-for-profit network of UK climbing walls. This allows you to access one free visit per month at other participating walls. To provide this benefit, your membership data will be shared securely with ICWC in line with UK GDPR law.

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

- Local government agencies
- The Disclosure and Barring Service
- Awarding bodies such as Mountain Training and the British Mountaineering Council

- 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
- Professional service providers such as accountants and lawyers
- Regulatory authorities, such as tax authorities
- In particular, we reserve the right to disclose your personal information to third parties:
  - in the event that 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;
  - if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
  - 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.

### **Children's personal information**

When we process children's personal information, where required 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.

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

Rhino Boulder 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 only accessible by appropriately trained staff and contractors, and stored on secure servers which have features to prevent unauthorised access.

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 (please see Section 11 below), we will remove it from our records at the relevant time. If you request to receive no further contact from us, we may keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

### **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 the same level of data protection law as under the GDPR.

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

Please note that some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information 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 have been approved by the European Commission) 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 contact 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 use strict procedures and security features to try and prevent unauthorised access.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [info@rhinoboulder.co.uk](mailto:info@rhinoboulder.co.uk) if you wish to make a request.

### **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 for us to do so and by placing an update notice on our website.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@rhinoboulder.co.uk](mailto:info@rhinoboulder.co.uk).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>