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CUSTOMERS PRIVACY POLICY

This Privacy Policy explains how Rhino Boulder Ltd ("Rhino Boulder", "we", "us") collects, uses and protects the personal information of our customers. This includes climbers, members, parents and guardians, supervisors, course participants and visitors to our website. It applies when you register with us, visit our centre, book or buy from us, or use our website.

1. Who we are and how to contact us

Rhino Boulder Ltd is the controller of your personal information, which means we decide how and why it is used. We are a company registered in England (company number 12770844).

ICO registration number: ZC283718

If you have any questions about this Policy or your personal information, please contact us:

- Email: info@rhinoboulder.co.uk
- Phone: 020 8050 8720
- Post: Rhino Boulder, Units 6 & 7, The Mall, Bromley, BR1 1TR

2. The personal information we collect

Depending on how you use our services, we may collect:

- **Identity and contact details:** name, date of birth, address, email address and phone number, including those of an emergency contact
- **Photograph of your face,** used to identify you when you visit
- **Registration details:** your signed Acknowledgement of Risk Form and, for under 18s, the details of the parent, guardian or supervisor who registers them
- **Visit and membership records:** visits, bookings, payments, memberships, courses and events, including entries made through partner schemes
- **Payment information:** bank details for direct debits (account holder name, sort code and account number) and card details, processed through our payment providers
- **Health information:** medical conditions you tell us about when you register or choose to share with us, and records of any accident, injury or medical emergency on our premises
- **Course and certification records,** for example your progress on the NICAS scheme
- **CCTV recordings** from our premises

- **Photos and videos** taken at our centre or events for marketing purposes
- **Marketing preferences and communications,** including your feedback, survey responses, questions and complaints
- **Website and advertising information,** such as your IP address, device and browser type, the pages you visit and how you reached our website (see section 9)

3. Where we get your information

Most of the information we hold is given to us directly by you, for example when you register, buy a membership, book a session or course, or contact us. We also receive information:

- **From parents, guardians and supervisors** who register a child or another climber. We treat this information in the same way as any other personal information we hold.
- **From partner schemes,** such as the Independent Climbing Wall Collective (ICWC) and other partners. Each partner holds its own members' information. When you visit using a partner scheme, we check your entitlement on the partner's portal and record that your entry was discounted under our agreement with them.
- **From our website and advertising platforms,** through cookies and similar technologies (see section 9).
- **From our CCTV system** when you visit our premises.

4. How we use your information and our lawful bases

Data protection law requires us to have a lawful basis for each way we use your personal information. The table below sets out what we use your information for and the basis we rely on.

Purpose	Lawful basis
Registering you and managing your visits, memberships, bookings, courses and events	Contract
Taking payments and managing your membership, including automatic suspension when a payment is not received (see section 10)	Contract
Checking that you have completed an Acknowledgement of Risk Form and keeping our centre safe	Contract; legitimate interests (running a safe climbing centre)
Sharing your membership details with ICWC so you can use its member benefit	Contract

Purpose	Lawful basis
Running NICAS and other certification schemes, and sharing results with the awarding body	Contract
Responding to accidents and medical emergencies	Vital interests; legal obligation
Keeping accident and incident records and dealing with any claims	Legal obligation; legitimate interests (establishing or defending legal claims)
Using CCTV for safety, security and the prevention of crime	Legitimate interests
Sending marketing emails and SMS	Consent
Using photos and videos for marketing	Consent where you are the main subject; legitimate interests for general images of our centre
Measuring how our website is used and how effective our advertising is	Consent (through cookies)
Excluding existing members from our online advertising	Legitimate interests
Improving our services using feedback and surveys	Legitimate interests
Answering questions, handling complaints and responding to your data protection requests	Legal obligation; legitimate interests
Keeping accounting and tax records	Legal obligation
Preventing fraud or misuse of our services	Legitimate interests

Where we rely on consent, you can withdraw it at any time by contacting info@rhinoboulder.co.uk or by using the unsubscribe link in our messages. Where we rely on legitimate interests, we have balanced our interests against your rights and you can object at any time (see section 14).

5. Health information

Health information is a “special category” of personal information and has extra protection under data protection law. We only use it:

- with your explicit consent, when you tell us about a medical condition on registration or at another time
- to protect your vital interests in an emergency, when you are unable to give consent
- where it is needed to establish, exercise or defend legal claims, for example following an accident

Telling us about relevant medical conditions helps us keep you safe while you climb.

6. Information you need to provide

To climb or use our facilities, you must give us your name, date of birth and contact details and sign our Acknowledgement of Risk Form. Under 18s must be registered by a parent or guardian. To set up a membership, we also need your payment details. If you do not provide this information, we will not be able to let you climb or set up your membership.

Giving us marketing preferences is optional and does not affect your access to our centre.

7. Children's information

Climbers under 18 must be registered by a parent or guardian, who provides the child's information to us. We treat children's information in the same way as other personal information and take particular care to protect it.

8. Who we share your information with

We do not sell or rent your personal information. We only share it where needed for the purposes in section 4, with:

- **ICWC:** when you take out a membership, you are also enrolled in the Independent Climbing Wall Collective, a not-for-profit network of UK climbing walls. This gives you one free visit per month at other participating walls. To provide this benefit, we share your membership details securely with ICWC.
- **Partner schemes,** to confirm your entitlement when you visit through them
- **Awarding bodies,** such as Mountain Training and the British Mountaineering Council, for NICAS and other certification schemes
- **Service providers acting on our behalf,** such as our membership and booking system, payment providers, IT, website hosting, cloud storage, and email and SMS providers
- **Advertising and analytics providers,** such as Google and Meta (see section 9)
- **Professional advisers,** such as our accountants, lawyers and insurers
- **Emergency services, the police, regulators and government bodies,** such as HMRC or the local authority, where the law requires it or to protect someone's safety
- **A buyer or seller** of our business or its assets, if Rhino Boulder is sold or merged

9. Cookies, website and advertising

Our website uses cookies and similar technologies. Some are needed for the website to work. Others, used with your permission, help us understand how visitors use our website and whether our marketing campaigns lead to a booking or purchase, so we can tell which marketing channels work best. We use Google Analytics, Google Ads and the Meta Pixel for this. These tools may collect information such as your IP address, device and browser type, the pages you visit, how you arrived at our website and whether you completed a purchase.

You can control or delete cookies through your browser settings.

We may also upload our members' contact details to Meta or Google in a secure, hashed (encoded) form so that existing members are excluded or included in specific adverts. You can object to this at any time by contacting info@rhinoboulder.co.uk.

10. Automated decisions

If a membership payment is not received, our membership system automatically suspends the membership until the payment is made. If you think your membership has been suspended in error, please contact info@rhinoboulder.co.uk. A member of our team will review the decision, and you can give your point of view and challenge it.

We do not make any other decisions about you based solely on automated processing that have a legal or similarly significant effect on you.

11. How long we keep your information

We keep personal information only for as long as we need it for the purposes it was collected for, and to meet our legal, insurance and accounting requirements.

Information	How long we keep it
Customer account, registration details and signed Acknowledgement of Risk Form	6 years after your last visit or the end of your membership. If you were under 18 when registered, until 6 years after your 18th birthday if that is later.
Visit, booking, membership and partner entry records	6 years after your last visit
Payment and transaction records	6 years from the end of the financial year in which the payment was made
Accident, incident and medical emergency records	6 years after the event. If the person involved was under 18, until 6 years after their 18th birthday if that is later.

Information	How long we keep it
CCTV recordings	Routinely overwritten after 30 days. Footage relating to an accident, incident or claim is kept for the same period as accident records, or until any claim is resolved if that is later.
Course and certification records	6 years after your last course or assessment
Complaints and related correspondence	6 years after the complaint is closed
Marketing preferences and contact details	Until you withdraw consent or unsubscribe. We then keep basic details on a suppression list so that we do not contact you again.
Photos and videos used for marketing	Until they are no longer used or you withdraw consent. Printed materials already in circulation cannot be recalled.
Website and advertising data	For the period set for each cookie or tool

We may keep information for longer where the law requires it or where it is needed for an ongoing legal claim. When information is no longer needed, we securely delete or anonymise it.

12. Keeping your information secure

We have appropriate technical and organisational measures in place to protect your personal information. It can only be accessed by trained staff and contractors who need it, and it is stored on secure systems with protection against unauthorised access. No transmission of information over the internet can be guaranteed to be completely secure, but once we receive your information we use strict procedures to protect it.

13. International transfers

We are a UK-based business. Some of our service providers may store or process personal information outside the UK, for example in the United States. Where this happens, we make sure your information is protected, either because the UK Government has recognised the destination as providing adequate protection, or by using safeguards approved under UK law, such as the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.

14. Your data protection rights

Under data protection law, you have the right to:

- **Access:** ask for copies of your personal information

- **Rectification:** ask us to correct information you think is inaccurate or complete information you think is incomplete
- **Erasure:** ask us to delete your information in certain circumstances
- **Restriction:** ask us to limit how we use your information in certain circumstances
- **Objection:** object to us using your information where we rely on legitimate interests, and to stop direct marketing at any time
- **Data portability:** ask us to transfer information you gave us to another organisation, or to you, in certain circumstances
- **Withdraw consent:** where we rely on your consent, withdraw it at any time
- **Automated decisions:** ask for a person to review a decision made automatically, give your point of view and challenge it (see section 10)

To make a request, please contact info@rhinoboulder.co.uk. There is usually no charge. We will respond within one month. If your request is complex, or you make several requests, we may extend this by up to two further months and will tell you if we need to. We may ask you to confirm your identity before we respond.

15. How to complain

If you are unhappy with how we have used your personal information, please contact us first at info@rhinoboulder.co.uk. We will:

- acknowledge your complaint within 30 days
- look into it and keep you updated
- aim to give you a full response within one month, and let you know if it will take longer

You also have the right to complain to the UK data protection regulator, the Information Commission's Office (ICO):

- Website: https://ico.org.uk
- Helpline: 0303 123 1113

16. Changes to this Policy

We may update this Policy from time to time. The latest version will always be on our website.