

## **PRIVACY NOTICE FOR OUR MEMBERS/NORDIC WALKERS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your time with us. This notice applies to you if you have booked an event with us, and/or opted to join our membership. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we, our** or **us** in this privacy notice are to The Rambling Business Academic Ltd. [Parent Brand of Berwyn Nordic Walking & Guided Walks].

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but the Director [Elizabeth Heyworth-Thomas] has overall responsibility for data protection compliance for the organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

### **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When booking on one of our walks or opting to join our membership, you may initially provide us **personal information** about you, or we may obtain information, such as:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- details of next of kin, family members, coaches and emergency contacts;
- any complaint or grievance information;
- please also note that our website may store cookies and site interaction information as managed by WordPress, as is standard on their websites.

### **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding your health, principally from the PARQ questionnaire, or any information shared with us from your General Practitioner, therapist or any health care professional as appropriate, with prior explicit consent.

Please note, we only collect data on the basis that:

- It is relevant to ensure your safety during participation of events or services;
- it is necessary for the establishment, exercise or defence of legal claims; or,
- you deem the information necessary.

### 3. WHERE WE COLLECT YOUR INFORMATION

We may collect information such as your name and contact details, when given to us through direct messages on social media channels, through our website, by email, post, or given verbally via telephone conversation. Information is only stored for booking confirmations, and for addressing any queries.

If you are providing us with details of next of kin, family members, and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To manage our relationship with you, including general bookings, communications, and opt-in membership.</b>	All contact and membership details, transaction and payment information (where appropriate), records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you information which relates to any member benefits, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on Nordic Walking.</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to answer any queries, or provide complaint handling services to you.
<b>Retention of records</b>	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.

<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure. Our website is monitored via WordPress. No personal data is inputted into the website by Berwyn Nordic Walking & Guided Walks. Member webpages as password protected, with a password given to yourself. You may input information yourself in order to purchase from our website. However, this is explicit. If you prefer to order any products directly from Berwyn Nordic Walking & Guided Walks, and not through the website – please email <a href="mailto:BerwynWalks@gmail.com">BerwynWalks@gmail.com</a> as this can be arranged.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To comply with health and safety requirements</b>	Records of attendance and medical information about your health	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<b>To administer your attendance at any courses or programmes you sign up to.</b>	All contact and membership details, transaction and payment data.  Details of any county membership and performance data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.
<b>To use information about your physical or mental health (including any injuries) or</b>	Health and medical information	We process any personal data pertaining to your health and wellbeing as appropriate. This includes for suitable

<b>disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</b>		considerations for any event you book with us. This also includes for any transfer to medical personnel (including first responders) in an emergency situation where appropriate, with prior consent.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. **DIRECT MARKETING**

From time to time, we may contact you by email with information about products and services we believe you may be interested in, with prior consent to do so.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing [BerwynWalks@gmail.com](mailto:BerwynWalks@gmail.com).

## 6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

Your personal details will not be shared with anyone outside of The Rambling Business Academic Ltd. or Berwyn Nordic Walking & Guided Walks, except in an emergency circumstances with prior consent. In this circumstance, only appropriate information will be shared such as name, address, emergency contact, and any medical or allergies information.

## 7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

8. The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### 10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### 11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [BerwynWalks@gmail.com](mailto:BerwynWalks@gmail.com), phone 07837 689 644, or write to us at:

The Rambling Business Academic Ltd.  
6 Mole Way  
Shawbirch  
Telford  
Shropshire  
TF5 OJZ

