

Privacy Policy (UK)

Last updated: [13 Jan. 26]

Who we are (Data Controller)

Edventures (“we”, “us”, “our”) delivers youth climbing and outdoor activity programmes and expeditions. We are the **data controller** for personal data we process in the UK.

Contact: [EJF Ventures [38 Marshmead, Hilperton, BA14 7SE], [info@ed-ventures.co.uk]. If appointed, our **Data Protection Officer (DPO):** [Edward Fairnington / info@ed-ventures.co.uk].

The data we collect

- **Participant details:** name, date of birth, medical/health information, accessibility needs, emergency contacts, school/club, progress records and assessments. (Special category data—e.g., health—requires extra protection.) [\[gov.uk\]](#)
- **Parent/guardian details:** name, contact details, booking/payment information. [\[ico.org.uk\]](#)
- **Safety & operations:** incident reports, consent forms, risk acknowledgments, safeguarding records where applicable. [\[gov.uk\]](#)
- **Media:** photos/video where consent is provided or another lawful basis applies. [\[ico.org.uk\]](#)
- **Website & communications:** device identifiers, cookies/analytics (see Cookies), email preferences. (PECR sets extra rules for electronic marketing and cookies.) [\[ico.org.uk\]](#)

We follow the UK data protection principles (lawfulness, fairness, transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; accountability). [\[gov.uk\]](#)

Why we use your data (purposes) and our lawful bases

We identify a lawful basis **before** processing and tell you which basis applies for each purpose. [\[ico.org.uk\]](#)

Purpose	Typical data	Lawful basis
Manage enquiries, bookings and	Parent/guardian and child details;	Contract with the booking adult (Article 6(1)(b)); for children’s participation

Purpose	Typical data	Lawful basis
participation (including age verification)	emergency contacts; booking info	logistics, legitimate interests where appropriate (Article 6(1)(f)) with extra care for children's interests. [ico.org.uk] , [ico.org.uk]
Safeguarding & safety (incidents, health disclosures, risk management)	Health and incident data	Vital interests (Article 6(1)(d)) and/or legal obligation (Article 6(1)(c)); for health data, Article 9(2)(c)/(g) conditions as applicable (safeguarding / substantial public interest under DPA 2018). [gov.uk]
Deliver coaching & progression	Session records, skills progression	Legitimate interests (coaching and educational delivery), balancing with children's rights. [ico.org.uk]
Communications about your booking	Contact details	Contract / legitimate interests (service messages, no marketing). [ico.org.uk]
Marketing to adults (news, offers)	Email, name	Consent for electronic marketing under PECR, or legitimate interests for non-electronic channels with an opt-out; we won't send unsolicited electronic marketing without valid consent. [ico.org.uk]
Marketing relating to children	Parent/guardian contact	We direct e-marketing to adults with parental responsibility in line with PECR and UK GDPR transparency/consent standards. [ico.org.uk] , [ico.org.uk]
Photos/video (celebrating achievements, promoting activities)	Images/video	Consent (withdrawable at any time) unless another lawful basis clearly applies (e.g., vital interests/safeguarding evidence). [ico.org.uk]

Purpose	Typical data	Lawful basis
Analytics & site performance	Cookies, device IDs	Consent for non-essential cookies/trackers; see Cookies. [ico.org.uk]
Legal, complaints, insurance	Relevant records	Legal obligation and legitimate interests (defend or establish claims). [ico.org.uk]

Note on children's consent online: For **information society services** that rely on consent, the UK sets the age at **13**; below this, parental consent is required. (This does not change that we normally contract with an adult for bookings.) [\[ukgdpr.fie...fisher.com\]](#)

Where we collect data from

- Directly from parents/guardians and participants (forms, bookings, email, phone, onsite).
- From schools or partner organisations when they organise groups with us (we ensure appropriate data-sharing terms).
- Automatically via our website/app (cookies/analytics – with prior consent where required).
(When collecting indirectly, we still provide the right privacy information.) [\[ico.org.uk\]](#)

Who we share data with

We share only what's necessary with:

- **Instructors and staff** (trained and authorised), **first aid or medical professionals** in an emergency. [\[ico.org.uk\]](#)
- **Payment and booking providers, IT/hosting, email services, SMS providers, insurers, legal advisors**—under data processing agreements. [\[ico.org.uk\]](#)
- **Schools/partner organisations** for group coordination and safeguarding where applicable. [\[gov.uk\]](#)

We do **not** sell personal data.

International transfers

If we use suppliers outside the UK, we apply a permitted transfer mechanism—e.g., UK adequacy regulations, the ICO's **International Data Transfer Agreement (IDTA)** or the **UK Addendum** to EU SCCs—plus a transfer risk assessment and supplementary safeguards where needed. You can request a copy of the relevant safeguards.

[\[ico.org.uk\]](#), [\[legalvision.co.uk\]](#), [\[sprintlaw.co.uk\]](#)

How long we keep data (retention)

We keep personal data only as long as necessary for the purpose collected, including to meet legal, accounting, or insurance requirements, then securely delete or anonymise it. Typical periods:

- **Bookings & participation records:** [e.g., 7 years] (limitation/insurance).
- **Incident/safeguarding records:** [e.g., per safeguarding/insurer guidance – often longer].
- **Marketing consents & preferences:** until you withdraw consent or we observe inactivity for [e.g., 24 months], then we refresh or delete.

Include these timeframes in your Record of Processing; your privacy notice must explain storage periods or the criteria used. [\[ico.org.uk\]](#)

Your rights

You (or your parent/guardian, where applicable) have rights to: **be informed; access; rectification; erasure; restriction; data portability; object; and rights related to automated decision-making/profiling.** You can exercise these at any time using our contact details. We respond within **one month** (extensions possible for complex requests). We will verify identity where needed. [\[ico.org.uk\]](#), [\[ico.org.uk\]](#)

If you're unhappy with our response, you can complain to the **Information Commissioner's Office (ICO)**: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; Tel 0303 123 1113; ico.org.uk. [\[gov.uk\]](#)

Children's data

We design our services with children's best interests in mind and use clear language suitable for young people. Where we rely on consent online, we obtain **verifiable parental consent for under-13s** and take reasonable steps to verify it. We avoid

profiling or marketing practices that are inappropriate for children. (See the ICO's Children's Code and guidance.) [\[ico.org.uk\]](#), [\[en.wikipedia.org\]](#)

Marketing

- We'll only send **electronic marketing** (email/SMS) **with your consent** (or soft-opt-in where legally available to adults), and you can opt out at any time. We don't knowingly send electronic marketing directly to children. [\[ico.org.uk\]](#)
- Non-electronic marketing may rely on **legitimate interests** with a simple opt-out. We record and honour objections. [\[ico.org.uk\]](#)

Cookies and similar technologies

When you visit our site, we ask for **consent** before setting any **non-essential** cookies (e.g., analytics, advertising). We provide clear information about each cookie's purpose, and it's as easy to **reject** as to **accept**. Essential cookies that are strictly necessary for the service do not require consent. You can change or withdraw consent at any time via our cookie banner or browser settings. (PECR governs cookies and e-marketing; the ICO clarifies consent standards.) [\[ico.org.uk\]](#), [\[ico.org.uk\]](#)

Security

We use appropriate technical and organisational measures to protect personal data (access controls, encryption in transit and at rest where appropriate, staff training, incident response). We keep these under review to maintain confidentiality, integrity, and availability. [\[gov.uk\]](#)

Data from schools or clubs (group bookings)

Where a school/club is a joint organiser, we agree roles and responsibilities (controller/processor) and make sure families receive the right privacy information. We use data only for delivering the event and related safety/administration unless we have a separate lawful basis. [\[ico.org.uk\]](#)

Photography and filming

We'll only capture and use identifiable photos/video of participants with **prior consent** (usually from a parent/guardian for under-18s) and you may withdraw consent at any

time. We'll provide clear options to opt out on the day. Operational CCTV (if used) is signposted and used for safety and security. [\[ico.org.uk\]](#)

Automated decision-making

We do **not** carry out decisions producing legal or similarly significant effects **solely** by automated means. If this changes, we will tell you and explain your rights, including the right to human review. [\[ico.org.uk\]](#)

Changes to this notice

We may update this policy from time to time and will post the latest version here with a new “Last updated” date. If changes are material, we will notify booking contacts by email or at the point of collection. (Right to be informed.) [\[ico.org.uk\]](#)

Quick compliance checklist (internal use)

- Name/contact details of controller (and DPO if any) disclosed; purposes & lawful bases stated; recipients and transfers explained; storage periods stated; rights and how to exercise them; ICO contact; whether provision of data is statutory/contractual; automated decisions if any; source if collected indirectly. (UK GDPR “right to be informed” requirements.)