



EDVENTURES | POLICY SUITE

Privacy Policy

Document reference	EDV-POL-011
Legal entity	EJFVENTURES LTD (company number 16938508), trading as Edventures
Version	1.0 — harmonised edition
Policy owner	Edward Fairnington, Owner and Responsible Manager
Approved by	Edward Fairnington
Approval date	16 October 2026
Effective date	16 October 2026
Next scheduled review	16 October 2027
Review frequency	Annually, or earlier following significant change or incident
Approval signature	_____

1. Introduction

Edventures is committed to protecting the privacy and personal information of everyone who participates in our activities, uses our services or communicates with us.

This policy explains what personal information we collect, why we collect it, how it is used, how long it is retained and the rights individuals have regarding their information.

This policy applies to all Edventures activities and operations, including:

- Children's and young people's climbing clubs.
- Adult wellbeing experiences and taster sessions.
- Outdoor activities, education and expeditions.
- Activities delivered at hired school facilities, climbing centres and other venues.
- Participant bookings, enquiries and communications.
- Instructor and contractor administration.
- Website enquiries and marketing activities.

Edventures processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

2. Data Controller and Contact Information

EJFVENTURES LTD (company number 16938508), trading as Edventures, is the data controller responsible for determining how and why personal information is processed in connection with its activities and services. Edward Fairnington is the designated Privacy Lead.

Company registration number: 16938508

Trading name: Edventures

Registered company name: EJFVENTURES LTD

Registered office: Marshmead, Hilperton, Trowbridge, England, BA14 7SE

Privacy Lead: Edward Fairnington

Email: info@ed-ventures.co.uk

Website: <https://ed-ventures.co.uk>

All enquiries relating to data protection, personal information or individual rights should be directed to the Privacy Lead using the email address above.

Where activities take place within hired school facilities or other venues, Edventures remains responsible for its own participant records unless a specific agreement establishes a different arrangement.

Hiring a venue does not automatically grant that organisation access to Edventures' booking, medical or safeguarding records.

3. Personal Information We Collect

Depending on the activity or service being provided, Edventures may collect the following information.

Participant and booking information

- Full name and age or date of birth.
- Contact details.
- Parent or carer details where appropriate.
- Emergency contact information.
- Booking information and attendance records.
- Relevant activity experience and participation requirements.
- Authorised collection and departure arrangements for children.

Medical and accessibility information

- Relevant medical conditions.

- Allergies and medication information.
- Disabilities, accessibility requirements and reasonable adjustments.
- Information necessary to support safe and appropriate participation.

Financial and administrative information

- Booking payments and transaction records.
- Invoices, refunds and financial correspondence.
- Records required for accounting and taxation.

Safeguarding and incident information

- Accident and incident reports.
- Safeguarding concerns and disclosures.
- Relevant observations, actions and referral records.
- Information necessary to manage participant welfare and safety.

Photographs and communications

- Photographs and videos where appropriate.
- Email correspondence and enquiries.
- Feedback and complaints.
- Marketing preferences and permissions.

Instructor and contractor information

- Contact details.
- Relevant qualifications, experience and professional memberships.
- Appropriate suitability and safeguarding records.
- Insurance, contractual and payment information.

We collect personal information directly from participants, parents or carers, booking and registration forms, correspondence and, where necessary, records created during activities.

Information may also be received from instructors, emergency services or relevant safeguarding agencies where lawful and necessary.

Edventures only collects information that is relevant and reasonably necessary for its activities and responsibilities.

4. Why We Use Personal Information

Edventures processes personal information to:

- Manage bookings, registrations and payments.
- Communicate activity arrangements and changes.
- Plan and deliver appropriate activities.
- Manage attendance, supervision and collection arrangements.

- Consider medical conditions, accessibility requirements and reasonable adjustments.
- Respond to emergencies and safeguarding concerns.
- Maintain accident and incident records.
- Manage complaints and insurance matters.
- Meet financial, legal and regulatory obligations.
- Administer instructor and contractor arrangements.
- Improve services using relevant feedback.
- Send optional marketing communications where legally permitted.
- Use promotional photographs and videos where an appropriate lawful basis and any necessary permission have been established.

Where information is required to arrange or safely deliver an activity, we will explain the consequences of not providing it.

Some information is necessary to fulfil bookings or meet legal obligations. Other information, such as optional marketing permissions, is voluntary.

5. Lawful Basis for Processing

Edventures processes personal information only where an appropriate lawful basis exists under Article 6 of UK GDPR.

The principal processing purposes and proposed lawful bases are:

Purpose	Article 6 lawful basis
Managing adult bookings and activities	Contract – Article 6(1)(b)
Managing bookings and payments made by parents or carers	Contract – Article 6(1)(b), for necessary information about the contracting adult
Managing children's participation, attendance and supervision	Legitimate interests – Article 6(1)(f)
Maintaining emergency contacts and necessary safety arrangements	Legitimate interests – Article 6(1)(f)
Routine collection and use of relevant medical declarations	Legitimate interests – Article 6(1)(f), subject to an appropriate assessment and an additional Article 9 condition
Handling safeguarding concerns	Legitimate interests – Article 6(1)(f), or legal obligation where a specific duty applies
Responding to life-threatening emergencies	Vital interests – Article 6(1)(d), where its conditions are satisfied
Maintaining legally required financial records	Legal obligation – Article 6(1)(c)

Responding to general enquiries	Contract, where taking steps requested before entering a contract; otherwise legitimate interests
Managing complaints and relevant incidents	Legitimate interests – Article 6(1)(f)
Managing instructor and contractor agreements	Contract – Article 6(1)(b), where applicable
Optional promotional photography relying on consent	Consent – Article 6(1)(a)
Consent-based marketing communications	Consent – Article 6(1)(a)

Where Edventures relies on legitimate interests, these generally concern safe and effective activity delivery, necessary administration, appropriate record keeping, protection of participants and management of the business.

These interests are balanced against the rights and freedoms of individuals, with particular care taken when processing children's information.

The lawful basis for a particular activity may differ where the circumstances require it. Edventures documents these decisions in its internal processing register.

Supporting Document: EDV-DP-002 – Edventures Lawful Basis and Data Processing Register.

This register identifies processing activities, relevant Article 6 bases and additional Article 9 conditions where applicable. It is reviewed when processing practices change.

6. Medical and Special Category Information

Edventures may collect medical and health information where necessary to understand individual participation requirements, make reasonable adjustments, manage foreseeable activity risks and respond appropriately to emergencies.

Health information is classified as special category personal data under UK GDPR and receives additional protection.

Processing this information requires both an appropriate Article 6 lawful basis and an applicable Article 9 condition.

For routine activity medical declarations, Edventures may rely on explicit consent under Article 9(2)(a), where valid consent has been obtained.

Where explicit consent is relied upon, individuals will be informed of the purposes for collecting their information and how it may be used. Consent will be requested through a clear affirmative statement and appropriately recorded.

Individuals may withdraw consent by contacting info@ed-ventures.co.uk.

Withdrawal does not affect processing lawfully undertaken before withdrawal. Where information remains necessary for another lawful purpose, Edventures will explain the relevant basis or condition.

If the withdrawal of consent means Edventures can no longer access information necessary for safe participation, the activity leader may need to reassess whether the activity can be safely delivered.

Other Article 9 conditions may apply where the relevant legal requirements are met, including:

- Vital interests in qualifying emergencies.
- Establishment, exercise or defence of legal claims.
- Certain safeguarding circumstances involving substantial public interest and the applicable requirements of the Data Protection Act 2018.

Medical information will only be available to authorised individuals who require it for relevant operational, safety or emergency purposes.

It will not be used for unrelated promotional activities.

7. Safeguarding Information

Edventures is committed to safeguarding children, young people and adults at risk.

Where safeguarding concerns arise, relevant personal information may be recorded and shared with appropriate organisations where necessary and lawful.

These may include:

- Local authority children's social care.
- Adult safeguarding services.
- The police.
- Emergency services.
- Relevant safeguarding professionals and statutory agencies.
- Venue safeguarding representatives where there is a justified reason.

Safeguarding information is shared only where necessary and proportionate, taking account of confidentiality, lawful information sharing and the need to protect individuals from harm.

Consent will not be treated as an absolute requirement for sharing information where disclosure is otherwise lawful and necessary for safeguarding.

Safeguarding records are stored securely with restricted access and are managed in accordance with Edventures' safeguarding procedures and retention arrangements.

8. Sharing Personal Information

Edventures does not sell personal information.

Information may be shared, where appropriate and lawful, with:

- Qualified instructors and activity leaders working on behalf of Edventures.
- Booking and payment service providers.
- Website hosting, email and digital storage providers.
- Emergency services and relevant healthcare professionals.
- Local authority safeguarding services and the police.
- Insurance providers and professional advisers.
- Regulatory authorities where required.
- Hired venues where limited information is necessary for agreed safety, safeguarding or operational arrangements.

Only information reasonably necessary for the relevant purpose will be shared.

Where third parties process personal information on behalf of Edventures, appropriate data processing arrangements and security safeguards will be maintained where legally required.

Schools and other venues do not automatically receive participant medical records or other confidential information merely because an Edventures activity takes place on their premises.

9. International Data Transfers

Some digital systems used for websites, email, bookings, payments or information storage may involve processing personal information outside the United Kingdom.

Where Edventures transfers personal information internationally, it will establish whether the transfer is covered by applicable UK adequacy regulations or another lawful transfer mechanism.

Where required, appropriate safeguards may include the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses, or another legally recognised mechanism.

Individuals may contact info@ed-ventures.co.uk to request further information about relevant transfers and safeguards.

10. Data Retention

Edventures retains personal information only for as long as reasonably necessary for the purpose for which it was collected or where continued retention is justified by applicable legal, safeguarding, insurance or contractual requirements.

Our standard retention and review arrangements are:

Record category	Retention period or criteria
Adult booking and attendance records	Normally 3 years after last participation
Children's booking and attendance records	Reviewed at age 21, with longer retention where justified

Emergency contact information	While necessary for participation and relevant follow-up purposes
Routine medical declarations	Reviewed after each activity or booking period and deleted when no longer necessary
Adult accident and incident records	Normally reviewed 6 years after the incident, subject to applicable requirements
Children's accident and injury records	Reviewed at age 21, subject to legal and insurance requirements
Safeguarding records	Retained according to safeguarding obligations, applicable guidance and documented case-specific decisions
Routine enquiries without bookings	Normally 12 months after last meaningful contact
Financial records	At least 5 years after the relevant 31 January Self Assessment submission deadline, subject to applicable exceptions
Instructor and contractor administrative records	Normally reviewed 6 years after the working relationship ends
Promotional photographs and videos	Reviewed annually and retained only while the identified purpose and lawful basis remain valid
Marketing contact information	Until withdrawal, opt-out or another relevant retention decision

Records relating to ongoing investigations, legal claims, safeguarding concerns or insurance matters may be retained beyond their standard review dates where justified.

Information is securely deleted, destroyed or anonymised when no longer required.

Supporting Document: EDV-DP-001 – Edventures Data Retention Schedule.

This internal schedule documents the retention and review arrangements for different categories of personal information and is reviewed periodically.

Photographs and Videos: Edventures retains photographs and videos in accordance with its Data Retention Schedule. Unselected images are normally deleted within 90 days, while selected promotional images may be retained for up to 24 months. Published images are reviewed at least annually. Participants may withdraw promotional consent at any time by contacting info@ed-ventures.co.uk.

11. Data Security

Edventures takes appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, disclosure or destruction.

These measures include:

- Password-protected accounts and devices.
- Multifactor authentication where available and appropriate.
- Restricted access to medical and safeguarding records.

- Secure storage of digital and paper information.
- Appropriate confidentiality requirements for instructors and contractors.
- Secure sharing of information where necessary.
- Periodic reviews of record access and retention.
- Secure disposal of information when no longer needed.
- Procedures for recording and responding to suspected data breaches.

Anyone working on behalf of Edventures who has access to personal information must handle it confidentially and only use it for authorised purposes.

12. Individual Data Protection Rights

Under UK GDPR, individuals have rights in relation to their personal information, depending on the circumstances and applicable lawful basis.

These include:

- **Right to be informed:** To understand how personal information is collected and used.
- **Right of access:** To request a copy of personal information held about them.
- **Right to rectification:** To request correction of inaccurate or incomplete information.
- **Right to erasure:** To request deletion where the law provides this right.
- **Right to restrict processing:** To request restrictions on certain uses of information.
- **Right to object:** To object to processing in applicable circumstances.
- **Right to data portability:** To receive certain personal information in a suitable format where applicable.
- **Rights relating to automated decision-making:** To receive applicable protections where significant decisions are made using solely automated processing.

Individuals have an absolute right to object to the use of their personal information for direct marketing at any time.

Where processing is based on consent, individuals may withdraw that consent at any time.

Requests should be sent to:

info@ed-ventures.co.uk

Edward Fairnington, acting as Privacy Lead, will respond without undue delay and normally within one calendar month, subject to applicable legal provisions.

We may request reasonable verification of identity before disclosing personal information.

Certain requests may be subject to legal exemptions, particularly where records are required for safeguarding, legal claims or regulatory obligations.

13. Photographs and Promotional Material

Edventures may take photographs or videos during activities for legitimate operational purposes or promotional use.

Where identifiable images are used for marketing, website content or social media, Edventures will establish an appropriate lawful basis and obtain any required permission.

Additional consideration will be given to safeguarding and privacy when photographing children and young people.

Where promotional photography is based on consent, individuals may withdraw that consent by contacting Edventures.

Withdrawal will stop future consent-based use and Edventures will take reasonable steps to remove relevant material from channels it controls where required. Complete removal of material previously copied or shared by independent third parties cannot be guaranteed.

Refusing consent to optional promotional photography will not prevent someone from participating in Edventures activities.

14. Marketing Communications

Edventures may communicate information about climbing clubs, wellbeing experiences and other activities where permitted by applicable data protection and electronic marketing legislation.

Optional marketing communications will only be sent where a suitable lawful basis and any necessary marketing consent or exemption apply.

Individuals can unsubscribe from marketing communications or object to direct marketing at any time by contacting:

info@ed-ventures.co.uk

Essential information about existing bookings, safety arrangements or activity changes may still be communicated where necessary.

15. Website Cookies and Tracking

The Edventures website may use cookies and similar technologies to support website operation and other functions.

Strictly necessary technologies may be used without consent where an applicable exemption applies.

Non-essential tracking technologies will be managed in accordance with applicable UK privacy and electronic communications requirements, including obtaining consent where legally required.

Information about website technologies and applicable consent or objection controls will be made available to visitors.

16. Personal Data Breaches

Edventures will investigate suspected or confirmed personal data breaches and take appropriate action to contain and manage them.

The Privacy Lead will assess any risks to individuals and determine whether notification to the Information Commissioner's Office or affected individuals is required.

Where notification to the ICO is legally required, Edventures will report the breach without undue delay and, where feasible, within 72 hours of becoming aware of it.

Affected individuals will be notified without undue delay where the applicable high-risk threshold is met.

Breaches, risk assessments and decisions will be documented appropriately.

17. Complaints

Individuals are encouraged to contact Edventures if they have concerns about the handling of their personal information.

Contact: Edward Fairnington, Privacy Lead

Email: info@ed-ventures.co.uk

Edventures will investigate concerns and respond appropriately.

Individuals also have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

18. Policy Review and Responsibilities

The Edventures Owner and Privacy Lead is responsible for overseeing implementation of this policy.

Responsibilities include:

- Maintaining appropriate records of processing activities.
- Reviewing the lawful basis for processing personal information.
- Maintaining the Data Retention Schedule.

- Reviewing access to sensitive information.
- Ensuring appropriate confidentiality arrangements for instructors and contractors.
- Responding to personal information requests.
- Managing data protection incidents.
- Reviewing third-party data processing arrangements.
- Updating privacy information when necessary.

This policy will be reviewed annually, or sooner where significant changes occur to legislation, activities, systems or processing arrangements.

19. Supporting Documents

The following internal documents support this Privacy Policy:

Reference	Document
EDV-DP-001	Edventures Data Retention Schedule
EDV-DP-002	Edventures Lawful Basis and Data Processing Register

These documents are maintained internally by the Edventures Owner and Privacy Lead.

20. Document Control and Approval

Policy: Edventures Privacy Policy

Reference: EDV-POL-011

Version: 1.0

Document Owner: Edward Fairnington

Role: Business Owner and Privacy Lead

Date: 16 October 2026

Next Review: October 2027

Approval: To be formally approved following confirmation that the policy reflects actual Edventures data processing practices.