

# Data Protection and Privacy Policy

# Adopted by Trustees 17 September 2024

## To be reviewed August 2026

## Introduction

The Data Protection and Privacy Policy (DPPP) describes how Viney Hill Christian Adventure Centre (VHCAC) manages personal information and respects your privacy. The DPPP may be amended from time to time. We encourage visitors to and users of our site to regularly review the DPPP.

All 'Personal Information' (which is defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains) that we collect and maintain will be subject to the DPPP.

We are registered with the Information Commissioner's Office (ICO).

## **Collecting Personal Information**

We have appointed a Data Protection Officer (DPO) for VHCAC. This person is responsible for overseeing questions in relation to the DPPP. If you have any questions, concerns, or requests about the DPP, how we manage your Personal Information, or any other issue relating to your Personal Information, please contact:

Viney Hill Christian Adventure Centre The Old Vicarage Viney Hill Gloucestershire GL154NA info@vineyhilladventure.org

01594 516162

#### **Collection of Personal Information**

If you book to visit our site or take part in activities, we will collect the following Personal Information from you:

- Contact information such as your name, phone numbers, address and email address
- We may have bank details on invoices, purchase orders or cheques
- We may have collected medical forms from you with name, address and medical details.
- Special category data: When we provide our services, we may collect information that could reveal racial or ethnic origin, or details of physical or mental health (including SEND), or for example, if you inform us about specific dietary requirements, this could indicate specific racial beliefs, or racial or ethnic origins. By providing such sensitive personal data, you explicitly agree that we may collect and use it in order to provide our services and in



accordance with this DPPP. If you do not allow us to process any sensitive data, this may mean that we are unable to provide all or parts of the services you have requested from us.

#### Updating your personal information and privacy preferences

We do not hold, or process on behalf of a third party, any of your personal information. To request or change any information we hold, please contact us at <u>info@vineyhilladventure.org</u>

You have the right to access and correct or delete your Personal Information at any time. This may be done by contacting us on <u>info@vineyhilladventure.org</u> or 01594 516162.

#### How your personal information is used

VHCAC collects your information in order to provide services to you, comply with our legal obligations, and to deliver our activities safely. We do not sell, rent or share your personally identifiable information to or with third parties in any way. We may use this information to:

- Process your financial transactions.
- Send you information.
- Respond to customer service requests, questions and concerns.
- Administer your bookings and activities.
- Inform us of any medical information that may affect your ability to take part in activities.
- Keep you informed about special offers and services of Viney Hill Christian Adventure Centre.

#### Sharing your information

We do not sell, rent or share your personally identifiable information to or with third parties in any way.

In certain situations, VHCAC may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Where required by law (e.g., to comply with a subpoena, warrant, court order, or legal process served on VHCAC), and when we believe that disclosure is necessary to protect our rights, avoid litigation, protect your safety or the safety of others, investigate fraud, and/or respond to a government request. We may also disclose information about you if we determine that such disclosure should be made for reasons of national security, law enforcement, or other issues of public importance.

#### Information sharing with service providers/agents

We use an outside provider for catering. The only information we pass on is that contained within the catering form you have completed.

We do not sell or otherwise provide Personal Information to other companies for the marketing of their own products or services.



#### **Data retention**

Whenever we collect or process your personal data, we will only keep it for as long as necessary for the purpose for which it was collected. At the end of that period, your data will either be deleted or anonymised, for example, by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis or business planning.

If you wish to delete your account or request that we no longer use your information to provide you services contact us at <u>info@vineyhilladventure.org</u>. We will respond to your request within 30 days.

We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## Choice/Opt out

You may "opt out" of receiving marketing emails or bulletins, email updates and newsletters by clicking on the 'unsubscribe' link in any emails we send you.

## **Protection of your Personal Information**

The Personal Information that you provide in connection with the use of the Centre or activities is protected in several ways.

- Your Personal Information resides on secure servers that only selected Viney Hill Christian Adventure Centre personnel have access to via password.
- Medical forms are kept in a secure place and only accessible to relevant staff such as Instructors who are delivering activities. We keep them for 6 months in case of any medical incidents not reported to us at the time of your visit. We then destroy them.
- In the case of an accident while taking part in any of our activities or on our site, we will keep your medical form and accident form in a secure place for up to 5 years, in case of any legal process as a result of the accident or incident.

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. When you provide your personal data through our website, this information is transmitted across the internet securely using high grade encryption. If you have any questions about security on our websites, please contact us at info@vineyhilladventure.org.

#### **Changes to the DPPP**

VHCAC reserves the right to amend the Privacy Policy from time to time at its sole discretion and will provide notice by email, or on the DPPP page of our website when we make material changes to the DPPP prior to the change becoming effective. If as the result of such changes, you want to alter the ways in which VHCAC is allowed to use your Personal Information, please contact us at info@vineyhilladventure.org.

You will be deemed to have been made aware of, and will be subject to, any material changes to the DPPP after such notice has been posted.



## Links to third parties

Our site includes links to other websites whose privacy practices may differ from those of VHCAC. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

## **Social Media Widgets**

Our websites may include Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

## **Privacy complaints**

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information.

To the extent that VHCAC's processing of your Personal Data is subject to the General Data Protection Regulation, VHCAC relies on its legitimate interests, described above, to process your data. Where VHCAC processes certain Personal Data for VHCAC's own direct marketing purposes, you have a right to object to our use of your Personal Data for this purpose at any time by clicking on the link, 'unsubscribe' and opting out from receiving all email.

VHCAC takes its users' privacy concerns seriously. If you believe that we have not complied with this Privacy Policy with respect to your Personal Information, please contact us at <u>info@vineyhilladventure.org</u> or by writing to:

Viney Hill Christian Adventure Centre The Old Vicarage Viney Hill Gloucestershire GL154NA

In your letter please describe in as much detail as possible the ways in which you believe that the VHCAC DPPP has not been complied with. We will investigate your complaint promptly.

If you have any questions about this Privacy Policy, the practices of the VHCAC, or your dealings with our website, you can contact us at <u>info@vineyhilladventure.org or the address above.</u>