

## Scope

This document supersedes all earlier versions and is designed to meet the requirements of the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications Regulations (PECR) and any legacy data concerning the Data Protection Act. These combined rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

## Who We Are

Kingswood Learning and Leisure Group Limited (company number: 3476432) and Kingswood Colomendy Limited (company number: 05897187), are both registered in England at Kingswood House, Alkmaar Way, Norwich, NR6 6BF. For the purposes of this document Kingswood will refer to both entities. Kingswood specialise in the provision of outdoor leisure group activities for primary and secondary schools, non-school groups, such as clubs and uniformed groups and the National Citizen Service. Outdoor programmes are also provided for overseas and UK students.

For the purposes of the General Data Protection Regulation 2018 (GDPR) we are the Data Controller and when carrying out certain contractual responsibilities on behalf of third parties, the data processor.

## Personal Data

Kingswood will collect and store personal data which you provide us with in order to fulfil our contractual obligations for a booking or service you have purchased from us; or to contact you with regards to employment or manage your data if you are an existing employee. If you give consent, we will also communicate with you our news, special offers, competitions and other content where you have expressed an interest, using your chosen method/s of opt in contact.

For the purposes of marketing, Kingswood will collect and store your basic personal data which you have provided, to make contact regarding the information you have requested using the methods you have agreed. This information will be retained to allow us to maintain ongoing contact and to promote the legitimate marketing interests of Kingswood. Your marketing data will be kept with us until you notify us that you either no longer wish to receive information, or you request that your information is erased. You can request to no longer receive information from us at any time, either via phone, by email or on our website, see the end of this Privacy Notice.

The data that we directly collect from you will be stored on our servers inside the UK, however any website analytics processed by Google may be held outside the EEA in accordance with the EU-US Privacy Shield.

It may also be processed by staff operating inside the UK or France who work for us or for one of our suppliers, who for the purposes of GDPR will be designated data processors. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details, the provision of support services and marketing. By submitting your personal data, you consent to this retention and processing.

Kingswood does not broker or share your data with third parties unless this is needed to fulfil our legal, contractual and/or marketing fulfilment. We will not collect any personal data from you that we do not need in order to provide or manage the services outlined. At all times Kingswood will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with GDPR and other data protection legislation.

### **The information we collect**

Kingswood receives and stores information you enter on our website or give us via telephone or email. This includes information that can identify you (“personal information”), and may include your first and last name, telephone number, postal and email addresses. If you enter into correspondence with us regarding a booking, enquiry or complaint, we may also keep details of that correspondence. You can choose not to provide information to us, but in general some information about you is required in order for you to register an account; purchase products; participate in a survey, competition or promotion, sign up for a newsletter, apply for a job or ask us a question.

### **IP addresses**

We may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns which does not identify any individual.

## **COOKIES**

### **What is a cookie?**

A cookie is a small plain text file used to store information relating to a visit to a website or an opened email campaign. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies such as an email marketing campaign. These files can be used to personalise and improve your digital and marketing related experiences.

### **Which cookies do we use and what do we do with them?**

We use cookies on our websites and in our email campaigns to monitor how well they are working and to continually improve the experience for our users. The use of identify cookies by Kingswood include:

- **authentication** - to identify you when you visit and navigate our website
- **status** - to help us to determine if you are logged into our website
- **shopping cart** - to manage the state of your shopping cart as you navigate our website
- **personalisation** - to store information about your preferences and to personalise your website viewing
- **security** - as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
- **advertising** - to help us to display advertisements that will be relevant to you
- **analysis** - to help us to analyse the use and performance of our website and services
- **cookie consent** – for storing your preferences in relation to the general use of cookies

### **Additionally, you can opt in or out to us using the following cookies:**

Website content – Kingswood can personalise content so your digital viewing experience is more relevant, based on your previous page views or Google searches.

Advertising – you may see personalised Kingswood adverts on other websites. In order for these to work, our third-party providers may use software which adds a cookie to your browser. This cookie enables us to serve the advert to you, let us know if you’ve seen it and if you then go on to make a purchase from our site. No personally identifiable information is held.

Emails – these cookies are used on our marketing emails to monitor the effectiveness of our campaigns and help us deliver more of the content that our customers find interesting.

When you open an email our software shows us information such as the number of times you have read the email and the links you have clicked. Tracking is only used on marketing emails and not email communications with Kingswood staff.

### **Third party cookies**

The Kingswood website uses third party embedded content from providers such as Facebook, YouTube and Google. Cookies may be set by these sites in order for this functionality to work, however these are not managed by Kingswood and data collected from them may be stored outside the EEA.

You can find out more about our third parties privacy policies by using the links below:

Facebook: <https://en-gb.facebook.com/policy.php>

Google and YouTube: <https://www.google.com/intl/en/policies/privacy>

### **Google Analytics**

Kingswood uses Google Analytics to scrutinise its website. The information Google Analytics gathers using cookies relating to our website, is used to create generic reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

### **Google AdSense**

Kingswood also publishes Google AdSense advertisements on our website. To determine your interests, Google will track your website behaviour and on other sites using cookies. This behaviour tracking allows Google to tailor the advertisements you see on other websites to reflect your interests (please note Kingswood does not publish interest-based advertisements on its own website).

You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com> You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org> Please note that these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>

### **Controlling cookies**

There are various ways that you can manage cookies, the majority of web browsers will allow you to disable the cookies you don't want. Please be aware that changing your cookie settings will affect all websites you visit unless you specify otherwise. Disabling cookies may also affect your browsing experience as some website functionality, such as logging in, will not work without them.

Please see below for more details on changing your settings on the most popular web browsers:

Internet Explorer

<https://support.microsoft.com/en-us/help/17479/windows-internet-explorer-11-change-security-privacy-settings>

Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies>

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Safari: <https://www.apple.com/legal/privacy/en-ww/>

### **Social Media Services**

You can choose to access certain third party social media websites and services (such as Facebook) through our site. When you do so, you are sharing information with those sites and the information you share will be governed by their privacy policies (including that the site may share information with us). You may be able to modify your privacy settings with these third party social media websites. Please refer to the relevant provider policies for more information.

The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please note that if you refuse to accept cookies from Kingswood, you may not be able to access portions of our site.

### **External links and social plug-ins**

If any part of the Kingswood website links you to other websites, those websites do not operate under this Privacy Notice. Kingswood recommends that you examine the privacy policies posted on these other websites to understand their procedures for collecting, using, and disclosing personal information.

## **USING YOUR INFORMATION**

### **How we use your information**

We use credit card information (such as cardholder name, credit card number, and expiration date) for the purpose of completing any bookings or purchases that you conduct on our site, which is PCI compliant. We use other information about you for the following general purposes: to provide you with the products and services you request; to provide you with booking confirmations and updates; to manage your account, including processing bills and providing booking notifications; to communicate with you in general; to respond to your questions and comments; to allow us to contact you for customer service, if necessary; to measure interest in and improve our products, services, and website; to resolve disputes, collect fees, or troubleshoot problems; to prevent potentially prohibited or illegal activities; to enforce our Terms of Use; and as otherwise described to you at the point of collection.

Additionally, at the point of your data collection, you can now opt in, enabling us to notify you by email, post or phone about special offers and services that may be of interest to you, customise your experience with Kingswood; to reward you as part of any reward and recognition programme you choose to join and to solicit with your permission other information from you.

### **Email communications**

We want to make it easy for you to take advantage of the leisure/education-related opportunities on our website. One way we do this is by sending you email messages that contain information about your leisure/education-related interests. For example, we may send you an email or contact you if you have attempted to make a booking. Please note that you will have the opportunity to choose not to receive these email messages in any such email we send.

### **We also may share your information**

When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Kingswood, the website or users of the website; and in connection with our Terms of Use and other agreements. In connection with a corporate transaction, such as a sale of a subsidiary or a division, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

In the event of an emergency, such as your child or pupil being taken ill whilst in our care, we may share information that you have provided us regarding your child including medical information, as well as your personal details with members of the emergency services or medical professionals. Your rights and choices with respect to the collection and use of your information will be respected at all times.

#### **Unsubscribing from marketing activities**

For the purposes of marketing, Kingswood is relying on consent and/or legitimate interest. You can exercise your right to change your preferences at any time to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right to unsubscribe from these activities at any time by contacting us via phone, email, the website, or by clicking 'unsubscribe' in the footer of any of our emails.

#### **Updates to our privacy notice**

We may update this privacy notice from time to time, each version has a sequential version number to enable you to identify the latest version. Your continued use of this site will constitute your agreement to any changes we may make. If you have opted in to receive marketing communications, you will be emailed a copy if we update our privacy notice.

#### **Data security**

We make it a high priority to ensure the security and confidentiality of the personal information you provide to us. All information you provide Kingswood is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. You can change your password if you believe that your personal security may have been compromised.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **DATA SUBJECT RIGHTS**

#### **Your rights as a data subject**

At any point whilst Kingswood is in possession of or processing your personal data, all data subjects, have the following rights:

**Right of access** – you have the right to request a copy of the information that we hold about you.

**Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

**Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.

**Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.

**Right of portability** – you have the right to have the data we hold about you transferred to another organisation.

**Right to object** – you have the right to object to certain types of processing such as direct marketing.

**Right to object to automated processing**, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

In the event that Kingswood refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

## **Kingswood, at your request, can confirm what information it holds about you and how it is processed**

You can request the following information:

- Identity and the contact details of the person or organisation (Kingswood) that has determined how and why to process your data
- Contact details of the data protection officer, where applicable
- The purpose of the processing as well as the legal basis for processing
- If the processing is based on the legitimate interests of Kingswood and more information about those interests
- The categories of personal data collected, stored and processed
- Recipient(s) or categories of recipients that the data is/will be disclosed to
- How long the data will be stored
- Details of your rights to correct, erase, restrict or object to such processing
- Information about your right to withdraw consent at any time
- How to lodge a complaint with the supervisory authority (ICO)
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data
- The source of personal data if it wasn't collected directly from you
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

### **To access what personal data is held, identification will be required**

Kingswood will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Kingswood is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to the [dataprotection@inspiring-learning.com](mailto:dataprotection@inspiring-learning.com) or by phoning +44 (0)800 655 6564 or writing to us at the address further below.

## **COMPLIANCE**

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Kingswood or its data processors, you have the right to complain to Kingswood. If you do not get a response within 30 days you can complain to the ICO.

The details for each of these contacts are:

**Kingswood Learning and Leisure Group Limited**, attention of the Data Protection Officer  
Kingswood House, Alkmaar Way, Norwich, NR6 6BF, United Kingdom  
Telephone 0044 (0) 800 655 6564 or email: [dataprotection@inspiring-learning.com](mailto:dataprotection@inspiring-learning.com)

### **ICO**

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone 0303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>