

DATA PRIVACY POLICY

UPDATED: APRIL 2025

VALID UNTIL: APRIL 2026



YOUR ADVENTURE
IN SAFE HANDS



WELCOME



OUR EXPERIENCE MAKES THEIRS A BETTER ONE.

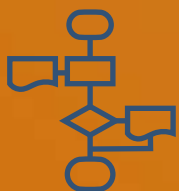
We are an Adventure Challenge Event organiser & provider of exceptional DofE Expeditions, driven by quality.

An Approved Activity Provider (AAP) who is respected for organising professionally delivered DofE Expeditions for schools, groups and individuals.

Priding ourselves on using the outdoors as an adventure playground, we deliver exceptional and inspiring challenge events for charities and companies, nationwide. These events offer a unique and bespoke outdoor activity opportunity and can be used help raise much needed funds for essential causes.



BEN KEEN
Owner / Director



Meticulous planning
with eye for detail.



The best
equipment
available.



3 decades of
adventure event
experience.



For Schools,
Groups, Charities,
companies and
individuals.

DATA PRIVACY POLICY

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DATA PRIVACY POLICY



INTRODUCTION

The Adventure Element Ltd is committed to protecting your privacy and security. This policy sets out how we collect and process personal data which we collect from clients or is provided to us. This data that is entered when clients make an enquiry on our website, and information collected by us as clients interact with our services. Whenever clients provide personal information, we will treat that information in accordance with this policy, with current legislation on protection and use of data.



WHO ARE WE - WHO HOLDS THE DATA?



WHO ARE WE - WHO HOLDS THE DATA?

We are The Adventure Element Ltd. Registered Company Number 09103989, in the UK. Our Data Controller is our Company Director. This data privacy statement applies to us and our activities in the UK.

WHAT DATA DO WE COLLECT AND HOW?

We collect the following categories of data about clients, participants and staff:

I. **Name and Contact Details**

The information provided when booking a programme, or if working as a self-employed contractor for us. e.g. given names and surname, date of birth, address, telephone number and email address.

II. **Personal / Sensitive Data**

For certain products, or if working for us, we are required to record personal / sensitive data, e.g. passport number; data about health.

III. **Financial Information**

For employees, payment information such as bank account details.

IV. **Photographs**

If authorised, allow us to use photographs taken, these may be stored with the clients or participants name and the fact that permission has been granted to use them.

If you are pictured in a photograph we have taken, and given us permission to use it, we will record this.

V. **Accidents or Incidents**

If an accident or incident occurs at our registered office, on one of our programmes, or involving one of our staff then we'll keep a record of this (which may include personal data and sensitive personal data, such as information relating to health).



HOW DO WE USE PERSONAL DATA?

HOW DO WE USE PERSONAL DATA?

We may process personal information for carefully considered and specific purposes which are permitted by regulations and enable us to carry out our services. The Adventure Element Ltd. will use data for the following purposes:

1. To answer an enquiry
2. For the supply of the service requested
3. For maintaining contact with clients and staff
4. Improving the services we provide
5. Processing any payments, or handling any contract we have entered into with clients and staff.
6. For our administration and for compliance with legislation and regulations

We will always comply with the law.

WHO HAS ACCESS TO DATA?

We may disclose personal information to any of our employees, contractors, agents, partners or subcontractors insofar as reasonably necessary for the purposes set out in this privacy policy. In addition, we may disclose personal information:

- A. to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings;
- B. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- C. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- D. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide information to third parties.



HOW DO WE SECURE DATA AND HOW LONG DO WE RETAIN IT?



HOW DO WE SECURE DATA AND HOW LONG DO WE RETAIN IT?

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information.

Personal data is collated using:

- **GoogleForms and/or monday.com**
For Challenge Event Registration, Accident and Near Miss Report forms, Safeguarding and Welfare Disclosure.
- **Checkfront**
Used for online bookings and payments via The Adventure Element website.
- **Liveforce**
Staffing platform. Used for staff recruitment, logistics planning and the storage of staff data.
- **Clients own online booking and registration platform**
Some clients collate their own participant data using their own online platforms, then transfer to The Adventure Element.

All online platforms are password protected and comply with Data protection regulations.

From these online platforms spreadsheets are created in different forms for our various products, events and programmes.

All personal information downloaded will be stored on a secure (password and encrypted) document. Passwords are emailed separately to the spreadsheet, and only shared with those personnel using requiring the data.

Certain personal information is printed and given to The Adventure Element Ltd staff for the purpose of an event / programme. Following the finish of the event / programme this data is disposed of by shredding.

All electronic transactions entered into via the website will be protected by encryption technology. The user acknowledges that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We retain data as long as required to realise the objectives as described in this privacy statement, but generally no longer than 2 years* after the last interaction with us, unless in so far as such is necessary for compliance with our statutory obligations, or for the benefit of potential disputes. If we no longer require data then we destroy this data or anonymise them in order that they can no longer be linked to the user.

*Accident Records: will be kept for a minimum of 3 years, or if it involves a child until they reach 21

WEBSITE

Use of Cookies

A cookie is a piece of data about a website that is stored in your web browser. Cookies are often used to store choices about how you use the site to improve your user experience. The Adventure Element Ltd website makes use of cookies in this way, and also helps us get a feel for what it is you are looking at. They're anonymous, they only give us information about the number of visitors to our site, so we don't know what you personally are looking at, just that someone has looked at what you've looked at.

Some parts of our site rely on cookies, but we will tell you where and when. Most browsers will allow you to control how cookies are handled, whether they are accepted and how long they are stored for. All browsers do this differently, but if you're concerned about privacy and security then please have a look in the 'help' documentation for your particular browser.

EXTERNAL LINKS ON OUR WEBSITE

Our website provides hyperlinks to other websites. This information is supplied in good faith; we exercise no control over linked sites and are not responsible for the privacy practices of other organisations and their websites. Each of these linked sites maintains its own independent privacy and data collection policies and procedures. If you visit a website that is linked to our site, you should consult that site's privacy policy before providing any personal information. This Privacy Statement applies solely to the information gathered by The Adventure Element Ltd. We are not responsible for the content or functionality of any of these external websites and this Policy does not apply to them.

PREFERENCES

By providing personal data the user consents to its processing as described in this Policy. If the user does not wish to receive information in any or all of following ways - mail, telephone, e-mail, SMS – or wish to express other preferences, contact: info@theadventureelement.co.uk



HOW CAN I EXERCISE MY STATUTORY RIGHTS?

HOW CAN I EXERCISE MY STATUTORY RIGHTS?

You may contact us at info@theadventureelement.co.uk at any time to exercise any of the rights you are granted under applicable data protection laws, which includes:

- the right to access your data
- to rectify them
- to erase them
- to restrict the processing of your data
- the right to data portability
- the right to object to processing

Please note that we may require you to provide additional information to verify your identity.

You can also contact us at if you have any questions, remarks or complaints in relation to this privacy statement. If you have any unresolved concerns, you also have the right to lodge a complaint with your Data Protection Authority.

If you have any problems or queries about your data, please contact:
The Company Director, The Adventure Element Ltd, Unit 2, Aldby Farm, Dacre, Penrith, Cumbria, CA11 0HN. Telephone: 01768 800212; info@theadventureelement.co.uk

DATA BREACH

If there is a breach in personal data security leading to its accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access. We will assess the risk to people's rights and freedoms and take appropriate action. If the breach is likely to result in a high risk of adversely



DATA RESPONSIBILITIES

DATA PROCESSOR

The Adventure Element will be classed as the Data Processor and will process the data that the client sends making the client the data controller. As the Data Processor, The Adventure Element does not own the data that we process nor do we control it. The adventure Element will not be change the purpose and the means in which the data is used and are bound by the instructions given by the data controller.

RESPONSIBILITIES

As the data processor The Adventure Element is responsible for carrying out the actual processing of the data under the specific instructions of the data controller, which may include:

- Design, create, and implement IT processes and systems that would enable the data controller to gather personal data.
- Use tools and strategies to gather personal data.
- Implement security measures that would safeguard personal data.
- Store personal data gathered by the data controller.
- Transfer data from the data controller to another organisation and vice versa.

DATA REQUIRED AND JUSTIFICATION

Prior to an event/expedition The Adventure Element will require an import of the data populated to a spreadsheet template with the following fields. The justification for these fields is listed below. The spreadsheet will be password protected and will be sent via Teams for security.

DATA	JUSTIFICATION
Title	The Adventure Element are committed to reach a 50:50 ratio of gender across their events portfolio. Tracking and storing Gender data is vital to this. The gender of a participant will be kept after the event but will not be assigned to a participant as their other details will be removed from storage.
First and Surname	In the event of an emergency The Adventure Element has to know the names of all participants. These details will be deleted from our systems 6 months after the event.
Contact Phone Number	In the event of an emergency The Adventure Element has to have a means of contacting all participants. These details will be deleted from our systems 6months after the event.
Next of Kin Name and Contact	In the event of an emergency The Adventure Element has to have a means of contacting a next of kin. These details will be deleted from our systems 6months after the event.
Medical Condition	The Adventure Element needs to know any pre-existing medical details of any participants to ensure they are able to participate in the event safely. It give The Adventure Element the opportunity to ensure the safety team are adequately briefed and the correct medical equipment is present on the event if necessary.
Medication	The Adventure Element will use this information to help assess the severity of the medical condition.
Dietary Requirement	The Adventure Element supply food as part of most events, it is therefore imperative that we know which participants have a specific dietary requirement to ensure they have food that they can eat.
Allergies	The Adventure Element must know the allergies of all participants completing an event to ensure adequate measures are in place to mitigate the risk to any participant with a specific allergy.
Parental consent (for under 18's only)	An adult must take loco-parentis responsibility for any event participant under the age of 18 years. For expeditions, under 18's must have the permission to attend from a responsible adult / carer.



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