

# **Data Protection Policy**

# Name and contact details of organisation

Name: bear + wolf Paddle

Email: <u>bearandwolfpaddle@gmail.com</u>

Phone number: 07917 063 274
Data controller: Nat Marchant
Data processor: Nat Marchant

# Purposes of data processing

Personal data is held on the participants and their emergency contact for the purpose of contacting the participant with information I think will be of interest to them, principally concerning forthcoming sessions and events, if a session is cancelled, or to enable me to tailor session and teaching to their individual requirements. In the case of the emergency contact, for the purposes of contacting in an emergency regarding the participant.

# Categories of individuals on which personal data is held

Participants who have attended a session delivered by bear + wolf in the last two years or have requested to be sent information relating to such events in this period.

## How we get the personal information and why we have it

The personal information we process is provided to us directly by you for one of the following reasons:

- booking on to one of our sessions
- registered interest in hearing about services we have to offer

#### Categories of personal data held

Personal data held on participants (and or parents/guardians of) may be stored electronically or on paper and may include the following:

- name
- year of birth
- telephone numbers
- email address
- relevant medical information
- emergency contact details

#### Categories of recipients of personal data.

Personal data will not be passed on to any third party without the permission of the individual concerned.

#### Data retention

Data will be retained for up to two years from the last contact with the data subject.

# bear + wolf

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# Basis for holding personal data

The lawful basis for which personal data is held is that of contractual necessity for the participant's contact details and a legitimate interest to email them relevant information. This is because bear + wolf use people's data in ways which they would reasonably expect and which have a minimal privacy impact, and the data has been voluntarily provided by the individual concerned.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting <a href="mailto:bearandwolfpaddle@gmail.com">bearandwolfpaddle@gmail.com</a>
- We have a legitimate interest.

#### Security

All personal data is stored securely. Digital data is held on a password- protected computer. The password is only known by the data controller (myself). Paper data is always kept under lock and key when not in the possession of a data controller. Personal data will not be passed on to any third party without the permission of the individual concerned.

Any individual is entitled to request to be removed from my mailing list.

Any individual is entitled to request a copy of their personal data held, to have incorrect data amended, or to ask for their data to be deleted from my records.

# Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at bearandwolfpaddle@gmail.com / 07917 063 274 if you wish to make a request.



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Any individual has the right to complain to the ICO if they consider there is a problem with the way their data is handled.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a>

Nat Marchant March 2021