Cobnor Activities Centre Trust
Privacy Notice Statement

Privacy policy
We are committed to protecting and respecting your privacy. This policy (together with our terms of use, booking conditions and any other documents referred to on it) sets out the basis on which any of your personal data will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it for the purpose of the Data Protection Act 1998 and General Data Protection Regulation (GDPR).

1. Relevant Legislation

Along with our business and internal computer systems, this guidance is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)

The data controller is Cobnor Activities Centre Trust, Cobnor Point, Chidham, West Sussex PO18 8TE.

2. Information

We may need to collect from you and process the following data about you to support your booking, courses and enquiry: - Information that you provide by completing our forms either by website www.cobnor.com or on site, such as your name and contact details.

This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information if you report a problem with our website:

- Information that you provide by filling in a hard copy form and returning to us, e.g. at one of our events.
- If you contact us, we may keep a record of that correspondence
- Details of your visits to our site including, but not limited to, traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access
- Information that you upload to our site

2A. Telephone Calls and Call Recording

We may record telephone calls made to and from Cobnor Activities Centre Trust for the following purposes:

- Training and quality assurance, to help us improve the service we provide.
- Record-keeping, to ensure accuracy in the information we provide or receive in relation to bookings, enquiries, or other operational matters.
- Security and compliance, including monitoring for the prevention or detection of crime or fraud, and to comply with any legal obligations.

Call recordings may include personal data such as your name, contact details, booking information, or any other information you choose to share with us during the call.

Call recordings are stored securely and accessed only by authorised personnel where necessary for the purposes listed above. Recordings will be kept only for as long as is necessary to fulfil these purposes, after which they will be securely deleted.

Disclosure of Call Recordings to Third Parties
We will not share call recordings with third parties unless there is a lawful basis to do so. However, we may disclose recordings to law enforcement agencies, such as the police, where required to comply with a legal obligation or where the disclosure is necessary for the prevention or detection of crime, or when we are otherwise legally permitted or compelled to do so.

By contacting us by telephone, you acknowledge that your call may be recorded for the purposes outlined above.

3. Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be held within our CRM system. The email address that you submit will not be stored within this database or in any of our internal computer systems.

Your email address will remain within our database for as long as we operate or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by emailing us on the email address at the bottom of this page. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

4. Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.

Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- Estimate our audience size and usage pattern
- Store information about your preferences and so allow us to customise our site according to your individual interests
- Speed up your searches
- Recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

5. Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination within the UK. By submitting your personal data, you agree to this transfer, storing, or processing.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted by Sagepay, and no payment information is stored on any of our onsite servers. 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.

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. However, our site could be subject to unauthorised access and although we take steps to prevent this, we cannot guarantee that it will not occur.

6. Uses made of your personal data

We may use information held about you in the following ways:

- To ensure we fully comply with our sporting National governing body awarding schemes (British Canoeing, Royal Yachting Association and The Adventure Activity Licensing Authority)
- To ensure that content from our site is presented in the most effective manner for you and for your computer
- To provide you with information, or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between you and us

- To allow you to participate in interactive features of our service, when you choose to do so
- To notify you about changes to our service;
- To send fundraising communications inviting you to support the Trust or to attend our events.

OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation. These third parties are based in the USA and are EU-U.S Privacy Shield compliant.

- Google (Privacy policy)
- Mailchimp (Privacy policy)
- Facebook (Privacy policy)

7. Disclosure of your information

We may disclose information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of The Cobnor Activities Centre Trust , our customers, or others.

Apart from the circumstances above, we will never share your personal data with third parties without your explicit consent to do so.

8. Your rights – direct marketing

You have the right to prevent your personal data being processed for direct marketing (which includes fundraising communications). You may exercise this right at any time by communicating your wish to do so in writing (either email or hard copy) to The Cobnor Activities Centre (details below).

When you have requested the above, we aim to stop contacting you immediately; in exceptional cases, this may take up to 28 days from receiving the notice in the case of email communications, or two months in the case of post.

When exercising this right, it will aid the administrative process if you include in your message's subject line the word "unsubscribe", your name and the address/email by which you were contacted. All fundraising communications from The Trust will contain further details on how to do this. We will also make every effort to act on such requests made via telephone, although we do not recommend this method as it may complicate the administrative process and lead to errors.

If you wish to opt out as described above, but do not have an email to reply to (e.g. you were contacted by post, but wish to opt out by email), you may do so by sending an email specifying your name and email address, with "unsubscribe" in the subject line, to sail@cobnor.com You may also

opt out by phone (01243 572791), or by sending a letter to that effect to Cobnor Activities Centre Trust, Cobnor Point, Chidham, West Sussex PO18 8TE.

Basic information (i.e. your name, relevant contact details, and date on which you requested no further contact) may be be held on our in-house suppression list, to ensure that you are not contacted in the future by accident.

This practice is in accordance with the Information Commissioner's guidance regarding Direct Marketing practice. This list is purely for internal administrative purposes, and will never be shown to a third party under any circumstances. In addition, if you feel your rights as an individual under the Act or other legislation have been infringed, you have the right to complain at any time to the appropriate supervisory authority (this will generally be the Information Commissioner's Office or, in some cases, the Fundraising Regulator).

9. Your rights – access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you. You may make the request in writing (either email or hard copy) to The Cobnor Activities Centre Trust (details below). Within 40 days of receipt of this request, you will be sent a summary of:

- Whether any personal data is being processed;
- What personal data is held, the reasons it is being processed, and whether it will be given to any other organisations or people;
- You will also be sent a copy of the information, comprising the personal data held, and given details of the source of the data (where available). If you submit your request via email, please send it to sail@cobnor.com , with the phrase "Subject "Access Request" in the subject line. Sending it without this wording or to an alternative email address, such as that of an individual member of staff, will delay action to your request

DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors, to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

Changes to your information or our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. The accuracy of your individual information is important to us.

If you change email address or any other information that we hold about you, please tell us either by email or post so we can amend our records

Contact

Any enquires regarding this privacy policy are welcomed and should be sent to sail@cobnor.com or Cobnor Activities Centre Trust, Cobnor Point, Chidham, West Sussex PO18 8TE