

P+ Privacy Policy for clients and suppliers

Date: -
Thursday, 29 November 2018



GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

PLATTY + is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

We will never sell your personal data. We only share data where we are legally required to, or we have asked your consent. You will always have the option to opt out. At present we do not use marketing communications. We will ask for your consent if we change this and modify this privacy agreement.

Platty + holds personal data relating to current and former clients and suppliers in order to perform legitimate interests. The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

Any questions you have in relation to this policy or how we use your personal data should be sent to jplatt@plattyplus.co.uk or addressed to Sarah Platt, PLATTY +, Smithy Green, Thornthwaite, Keswick, Cumbria, CA12 5SL 017687 76572.

This policy (together with our terms of use on our website and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, 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.

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR9 refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

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2. About us?

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by Platty + who is the data controller. This means we decide how your personal data is processed and for what purposes.

Our contact details are:

Smithy Green, Thornthwaite, Keswick, Cumbria, CA12 5SL

017687 76572

jplatt@plattyplus.co.uk.

For all data matters ask for **Sarah Platt**.

3. The purpose(s) of processing your personal data

We collect data you provide to us.

This includes information you give when requesting information about our services, make a booking or communicating with us and if you post on one of our social media pages.

The information we collect

personal details (name, date of birth, email, address, telephone etc.)

financial information (If you use a credit card to pay, we will pass your credit card details securely to our payment provider (iZettle). Other payment methods (e.g. ApplePay) are handled in a similar manner. Platty + will never store card details.

If you purchase a PLATTY + gift voucher for someone, book as a family or are the parent of a participant, your details will be recorded (as will the recipients) and your relationship to that person will be recorded.

Occasionally, we may collect information about certain clients or suppliers from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

We collect some sensitive personal data about the health of our clients in case you have an accident. If this does occur, we'll take extra care to ensure your privacy rights are protected.

If an accident or incident occurs whilst on our site or during our activities, then we'll keep a record of this (which may include personal data and sensitive personal data).

We use your personal data for the following purposes:

Administrative purposes to maintain our own accounts and records

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enter into, or perform, a contract with you; for our services

comply with a legal duty;

protect your vital interests;

You may give us information about you by filling in forms on our site www.plattyplus.co.uk or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service or other social media functions on our site and when you report a problem with our site.

4. The categories of personal data concerned

We will collect, store and use the following categories of personal data about you:

Contact details such as: name, title, addresses, telephone numbers, mobile phone numbers and personal email addresses;

Date of Birth;

Gender;

Next of kin and emergency contact information;

Bank account details (when necessary) for example, to reimburse in the event of change of your booking or legitimately incurred expenses;

CCTV footage and other information through electronic means;

Testimonies, quotes or opinions about PLATTY +;

Photographs, video and audio footage;

Information gathered from social media sources in the public domain e.g. Facebook.

We may collect, store and use the following special categories of personal data about you:

Information about your health including any medical conditions or dietary requirements;

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5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

We process personal data because we need to do so to run the PLATTY +, to exercise our rights and obligations, and to comply with legal and regulatory duties we are under:

necessary for the performance of a contract with the data subject or to take steps to enter into a contract for, but not limited to, the provision of hire and tuition for water sports.

necessary to protect the vital interests of you or another person health information in the case of illness or accident whilst in our care

Special categories of personal data (article 9 of GDPR) We will only process special categories of personal data with your explicit consent, or if there are other grounds for doing so, including (but not limited to) the processing being:

necessary to protect your vital interests (or someone else's interests);

necessary for bringing, defending or conducting a legal claim.

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and unless required to do so by law, we will not otherwise share, or distribute any of the information you provide to us without your consent. We only store information within the European Economic Area (EEA). If our trusted service providers (e.g. software providers like Microsoft) transfer any data outside of the EEA we will take steps to make sure adequate levels of privacy protection, in line with The General Data Protection Regulation and associated legislation, are in place.

7. How long do we keep your personal data?

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract.

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9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

In providing services to you, we may be required to send information outside the European Economic Area. Countries outside the European Economic Area do not always have strong data protection laws. However, we will always take steps to ensure that your information is used by third parties in accordance with this policy.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact Sarah Platt (our data protection officer) on PLATTY +, Smithy Green, Thornthwaite, Keswick, Cumbria, CA12 5SL. 017687 76572. jplatt@plattyplus.co.uk

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If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

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