

General Data Protection Regulation (GDPR) – H5 Adventure



Key details

- Policy prepared by: Paul Webb
- Approved by board/management on: 13 February 2021
- Policy became operational on: 13 February 2021
- Policy reviewed by: Rikki Crossley
- Date Reviewed: 1 March 2024
- Next review date: 13 February 2027

Introduction

H5 Adventure Ltd needs to gather and use certain information about individuals. These include all stakeholders H5 Adventure Ltd has a relationship with or may need to contact.

This policy describes how personal data must be collected, handled, and stored to meet the company's data protection standards and to comply with the law.

Policy Aims

This GDPR policy aims to ensure H5 Adventure Ltd:

- Complies with data protection law and follow good practice.
- Protects the rights of staff, customers, and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

GDPR Law

The GDPR came into Law on 25th May 2018 describes how organisations – including H5 Adventure Ltd – must collect handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper, or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR is underpinned by eight important principles. These say that personal data must:

- 1 Be processed fairly and lawfully.
- 2 Be obtained only for specific, lawful purposes.
- 3 Be adequate, relevant, and not excessive.
- 4 Be accurate and kept up to date.
- 5 Not be held for any longer than necessary.
- 6 Processed in accordance with the rights of data subjects.
- 7 Be protected in appropriate ways.
- 8 Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

H5 Adventure Ltd

19 Thornhill, Royal Wootton Bassett, Wiltshire SN4 7RX
T. 01793 731 068 E. office@h5adventure.com W. www.h5adventure.com
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People, Risks and Responsibilities



Policy Scope

This policy applies to:

- The head office, all staff, paid or unpaid of H5 Adventure Ltd
- All contractors, suppliers and other people working on behalf of H5 Adventure Ltd

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals.
- Postal/Email addresses and telephone numbers.
- Plus, any other information relating to individuals.

Data Protection Risks

This policy helps to protect H5 Adventure Ltd from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Filing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with H5 Adventure Ltd has responsibility for ensuring data is collected, stored, and handled appropriately. Everyone that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **directors** are ultimately responsible for ensuring that H5 Adventure Ltd meets their legal obligations.
- The data protection officer, Rikki Crossley is responsible for:
 - a) Keeping the directors updated about data protection responsibilities, risks, and issues.
 - b) Reviewing all data protection procedures and related policies.
 - c) Arranging data protection training and advice for the people covered by this Policy.
 - d) Handling data protection questions from staff and anyone else covered by this policy.
 - e) Dealing with requests from individuals to see the data H5 Adventure Ltd holds about them.
 - f) Checking and approving any contracts or agreements with third parties that my handle the company's sensitive data.

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The IT Manager, Paul Webb is responsible for:

- a) Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- b) Performing regular checks and scans to ensure security hardware and software is functioning properly.
- c) Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.



The Marketing Manager, Paul Webb is responsible for:

- a) Approving any data protection statements attached to communications such as emails and letter
- b) Addressing any data protection queries from journalists or media outlet like newspapers
- c) Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

General Staff Guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- **H5 Adventure Ltd will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong **passwords must be used**, and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within **the company or externally**.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a **locked drawer or filing cabinet**.

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- Employees should make sure paper and printouts are **not left where unauthorised people could see them.**
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts:

- Data should be **protected by strong passwords.**
- If data is **stored on removable media** (like a CD or DVD) these should be kept locked away securely when not being used.
- Data should only be stored **on designated drives and servers** and should only be uploaded to an **approved cloud computing services.**
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently.** Those backups should be tested regularly, in line with the company's stand backup procedures.
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall.**

We will delete all data on all children (under 18 years of age) after the course they have attend. Except in cases where there has been an incident/injury/medical incident/near miss, of which, we will keep this data for 7 years after the attended with us, as this is the length of time, of which a legal case could be brought against us with regard an incident.

We will not keep or share any data from any client onto anybody outside H5 Adventure Ltd.

Data Use

Personal data is of no value to H5 Adventure Ltd unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption, or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally.** It should never be sent by email, as this form of communication is not secure.
- Data must be **encrypted before being transferred electronically.** The IT manager can explain how to send data to authorised external contracts.
- Personal data should **never be transferred outside of the European Economic Area**
- Employees **should not save copies of personal data to their own computers.** Always access and update the central copy of any data.

Data Accuracy

The law requires H5 Adventure Ltd to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

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- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- H5 Adventure will make it **easy for data subjects to update the information** H5 Adventure Ltd holds about them.
- Data should be **updated as inaccuracies are discovered**.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

Subject Access Requests

All individuals who are the subject of personal data held by H5 Adventure Ltd are entitled to:

- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at office@h5adventure.com. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £100 per subject access request if over 18 years of age and the request is manifestly unfounded or excessive. This is free for those under 18 years of age. The data controller will aim to provide the relevant data within 28 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing Data for Other Reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, H5 Adventure Ltd will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

Providing information

H5 Adventure aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

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