# Action Academy Privacy and Cookie Policy

## Why you should read this policy

We ask that you read this Privacy and Cookie Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

#### Who we are

https://bigbikebash.org.uk/ (Website) is operated by Action Academy. We are a charitable organisation that organise the 'Big Bike Bash' event solely to raise funds and awareness for UK Youth / Avon Tyrrell and registered under charity number 1166211, whose registered office address is at 78 Shirley Avenue, Southampton, Hampshire, SO15 5NJ.

Action Academy ('We' or 'us') collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as 'controller' of that personal information for the purposes of those laws.

# When do we collect your Data?

We collect personal information about you when you send feedback, post material, contact us for any reason and by any medium, purchase tickets for our events, share information via the Website's social media functions, or report a problem with the Website.

We collect this personal information from you either directly, such as when you contact us via our Website or indirectly, such as your browsing activity while on our Website (see 'Cookies' below).

# What Personal Data does Action Academy process?

The personal data (data) we process for each participant can include, but is not limited to, first and last names, date of birth, address and telephone number. The email addresses of people purchasing tickets are also processed.

Supplier, volunteer and trustee data are also collected and processed. The data processed can include, but is not limited to, first and last names, date of birth, address, email address and telephone number..

The 2018 Data Protection Act defines Sensitive Personal Data as "special categories of personal data". We do not process any Sensitive Personal Data.

#### Information about others

If you give us data on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data.

### Information that will be collected automatically

**Cookies**: We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

# What digital images do you process?

We will take photographs and/or film footage, record digital images and make sound recordings during any of our events for use in our printed publicity, on future event web sites and online publicity via social media (including Facebook and Twitter) and shared with UK Youth for use in their printed and online publicity (including Facebook and Twitter).

Should you not wish for us to process digital images of you please get in touch with us.

### What Personal Data is processed by third parties?

As part of the ticket purchasing process we use two third party providers, Paypal for payments and Sendgrid for the issuing of tickets. We do not collect, store or process any data you enter onto Paypal when buying the tickets.

We provide Sendgrid with the email address of the purchaser to facilitate the issuing of the tickets. Paypal and Sendgrid privacy policies are available on their websites.

Our Website is hosted by Google Cloud Platform; a Privacy Policy is available on their website.

#### With whom is your data shared?

Digital images may be shared on social media and with UK Youth to promote the Avon Tyrrell Activity Centre.

Data is not passed on by us to any other organisation (unless they are one of our data processors) except where we may have to comply with a legal obligation to do so.

#### What is this data used for?

We use your data for the administration of the ticket purchasing process and the Event registration process. This includes, but is not limited to, invoicing, event confirmation emails and contacting you in relation to relevant updates regarding the applicable event.

We may use your digital images to promote future events on our Website and on other media including social media.

We do not use your data for direct marketing purposes.

Supplier personal data is used for ordering and paying for goods and services.

### How is your data stored?

Data in digital form is stored on Google's, PayPal's and Sendgrid's secure servers. Where there is a need for Action Academy to process this data, it shall be stored on computers with sufficient protections in place, such as password protection.

Paper records, when required, are stored in secure physical locations.

#### Who has access to your data?

Your data will only be accessed by those individuals associated with Action Academy that require access for the purposes of processing your data in line with the original purpose it was collected.

#### What is the legal basis for processing this data?

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

Action Academy processes certain data on the basis of a legitimate interest necessary for the achievement of the objectives of the charity.

We also process data on a contractual basis where our use of your personal information is necessary for a contract we have with you, such as when you purchase tickets to attend one of our events.

We may also rely on your consent in certain circumstances where you have given us clear consent for us to process your personal information for a specific purpose.

It may also be a legal obligation for us to process your data in line with complying with the law.

# **Your Rights**

We will collect and store information about you, as detailed above. Under the GDPR, you have enhanced rights as an individual which include:

- You have the right of access to your personal records or other information that
  we hold about you. There is no administrative charge for this service usually,
  however we can charge a reasonable fee based on the administrative cost of
  providing the information if a request is manifestly unfounded or excessive, or
  for requests for further copies of the same information.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the right to have the data we hold about you erased in certain situations.
- If you wish us to continue to store your information but wish us to keep your data separate and not process it in any way, please let us know.
- You have the right to ask us to stop processing your personal data for direct
  marketing purposes. You may also specify that you object to direct marketing
  by particular channels such as by email of telephone. If this is the case, please
  specify the channels you are objecting to in your communications with us.
- You have the right to data portability. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at the address below.

You may need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

## Transfer of your information out of the EEA

Your personal data may be transferred outside of the country where you are located, including outside of the European Economic Area (EEA). Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

Please note that we review all processors we utilise and ensure that there are adequate safeguards in place to protect your personal data, such as adherence to binding corporate rules or compliance with the EU-US Privacy Shield Framework.

### For how long do we keep your data, and why?

We keep data for as long as it is necessary for our processing in line with the original purpose of collecting the data.

Financial records held by our payment processor will be held in accordance with their Privacy Policy. Any financial and contractual records held by Action Academy will be kept to meet our legal obligations.

#### Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- recognise you whenever you visit the Website;
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve the Website content, products and services and to help us better understand our visitor and customer requirements and interests; and
- make your online experience more efficient and enjoyable.

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

#### **Description of cookies**

The cookies that we utilise on our Website are placed to fulfil such functions as allowing visitors to share content with a range of networking and sharing platforms, analysing how you use the Website and giving you a better more personalised experience.

Some of the cookies we utilise on our Website include:

Cookie Name	Cookie Description
_ga	Definition: Used to distinguish users
	Source: Google Analytics
	Duration: 2 years
_gid	Definition: Used to distinguish users
	Source: Google Analytics
	Duration: 24 hours

#### How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org.

#### **Changes to this Privacy and Cookie Policy**

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

#### How to contact us

Please contact us if you have any questions about this Privacy and Cookie Policy or the information we hold about you.

If you wish to contact us, please send an email to <a href="mailto:robin@bigbikebash.co.uk">robin@bigbikebash.co.uk</a> or write to Action Academy at the registered office address 78 Shirley Avenue, Southampton, Hampshire, SO15 5NJ.

#### **Concerns and Questions**

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.