

# **Hillgoers General Privacy Policy**

#### Introduction

Hillgoers is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after you access our services, in accordance with the General Data Protection Regulations (GDPR, in force 25th May 2018). This Privacy Notice (together with any other privacy notice that we may provide to you) contains important information about how we collect, manage, use and protect your personal data.

This privacy notice is applicable to all visitors to our websites (as outlined below) and the customers of our services.

## Company contact details

Hillgoers, a trading name of Dalmaik Ltd, is an outdoor activities company specialising in guided walks, navigation tuition and Duke of Edinburgh's Award.

Contact for Data Protection Matters: Garry Cormack

Address: South Mains Cottage, Drumoak, Kincardineshire, AB315AE

Phone Number: 07753488688 Email: info@hillgoers.com

#### **Our websites**

This privacy notice is applicable to the following websites associated with Hillgoers along with any websites we may operate in the future,

https://www.hillgoers.com https://wildscottishweddings.com

#### Information we collect & process and how we get the information

We may collect and process the following personal data about you as well as information from individuals that is provided on behalf of others;

- Information that you provide by filling in forms on the websites or provide to Hillgoers via email, telephone or social media when using their services including your name, address, email address, phone number, date of birth, gender, age, emergency contact details in case of an incident and financial and credit card information. This includes information provided at the time of registering for events, subscribing to our services, posting materials or goods or requesting further services, entering a competition or promotion sponsored by Hillgoers and when you report a problem with our site.
- Medical information and consent.
- Photos and videos taken during events where such photos and videos constitute personal data, which would be taken only with your consent.
- Correspondence with you, either via email, record of call, voicemail message, social media message or otherwise.
- · Details of transactions you carry out through our websites and fulfilment of your orders.
- Details of visits to our websites including, but not limited to, traffic data, location data, weblogs, other communication data and resources that you access (see the Cookies section below for more information on this).
- Any information that you choose to send us including via email or social networking tools such as Twitter, Facebook and Instagram.



#### Cookies

- A "cookie" is a text file that is downloaded to the hard drive of your computer and is used to remember your preferences and sessions.
- We use this information to (anonymously) track movements through our sites, to find out how they are being used and to enable improvements to our services to be made. This information is shared with Google Analytics and may be shared with third parties who perform similar services. This information is fundamental to the provision of website services. Personal information about you is not collected during the tracking process.
- You can disable the cookies we attach if your browser supports this. For further information on how to do this, please refer to <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>. However, you should bear in mind that if you exercise this option you may be unable to use some of our on-line services.

## Why we need your personal information

We will only use your personal information when the law allows us to. Most commonly, we require your personal information in the following circumstances:

- To establish a booking with you, for example, if you make a purchase from us or enter into an agreement with us to receive or provide services,
- Where we need to comply with a legal obligation and/or,
- Where it is required in order for us to perform a task in the public interest.

# Under the General Data Protection Regulations (GDPR), the lawful bases we rely on for processing your information are,

- Your consent. You can remove your consent at any time. You can do this by contacting Hillgoers via the details given above.
- We have a contractual obligation.
- We have a legal obligation.
- We have a vital interest.
- We need it to perform a public task.
- We have a legitimate interest.

#### How we use your information

When we are providing a service to you, we may use information held about you in the following ways;

- To book individuals onto events.
- To hold and process medical and accessibility information in relation to event provision when required for the safety of event attendees.
- To process any accessibility information provided if relevant in order to ensure adequate facilities are provided for individuals.
- To process email addresses or other contact details to provide marketing or communications, request customer feedback only where individuals provide consent for us to carry out this type of activity.
- If you have given us consent to take photos/videos of you, we may share this on our websites, social media and Hillgoers publications.
- 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, products 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 allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service where we have consent to communicate with you via marketing.



#### Who we share your information with?

- Hillgoers engages third-party suppliers to provide services. These suppliers may process personal information on our behalf and are subject to written contractual conditions to only process that personal information under our instructions and protect it.
- We may share your information with third parties where it is necessary to perform a contractual service or administer our relationship with you, where we are required by law to do so, where we have a legitimate interest in doing so, or when we are required by public interest requirements to do so.
- If your personal information is included in any images or videos taken by us at our events, where that photo or video constitutes personal data and we have consent to use such personal data, we may share this for promotional/media purposes.
- We may share personal information with our professional and legal advisors for the purposes of taking advice.

We may also share your information with third parties from time to time if that sharing is required in relation to the service, we are providing to you, including, but not limited to:

- Third party software, analytics, website and search engine suppliers or IT suppliers including, for example, Google Analytics & MailChimp.
- Service providers in relation to courses and bookings you make with us.
- Scottish and National Governing Bodies, Scottish local authorities, the Scottish Qualifications Authority, clubs and
  other associations in respect of eLearning or coaching applications, where the individual data subject would have
  knowledge of that information being shared.
- Finance/Payment software including PayPal, Stripe and bank transfer.

# How we store, protect and dispose of your personal information

Your personal information is electronically securely stored on cloud-based storage (Google Drive and OneDrive) and on our website servers. All hardware used by Hillgoers has physical security measures; strong passwords; password lock out; managed permissions; two factor authentications; encryption; antivirus software; anti-malware software; data loss prevention software; secure Email Gateway; software patch management; appropriate data backup arrangements. Some online personal data that we collect from you may be transferred to and stored outside the European Economic Area if based upon external servers.

Your personal information may also be stored on third party, cloud-based solutions. Where this is the case, Hillgoers will ensure that that third party complies with the GDPR when processing your data.

Data processors may temporarily store or print data for short durations after which the data must be uploaded to online storage or deleted. For example, a freelance instructor may print off emergency details for a participant but must safely destroy this after the event (see deletion / destruction of data).

#### **Data Retention**

We will not keep your personal information, for any purpose, for longer than is necessary and we will only retain the personal information that is necessary in relation to the purpose.

Some personal data will be retained by Hillgoers for a period of 6 years where this is required for financial auditing purposes.

Most other personal data will be deleted or destroyed unless you have agreed to be contacted by the MailChimp mailing service. One exception is when you leave a comment on Hillgoers website, blogs or social media as these are retained indefinitely unless you remove them.

#### **Deletion / Destruction of Data**

Online data will be deleted from all online sources after the retention periods described above. Hard copies of any personal data will be destroyed by shredding immediately after any Hillgoers event.



#### 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 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 information in certain circumstances.
- Your right to object to processing You have the the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the 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 if you wish to make a request.

### How to complain

You can also complain to the ICO if you are unhappy with how we have used your data.

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

Helpline number: 0303 123 1113