



Encompass Training SW Ltd
Great Potheridge House
Privacy Policy
May 2021

Introduction

We take your privacy seriously and we respect your privacy and data protection rights. This privacy notice aims to give you information on how and what data we collect, and how we use your personal data when you book with us. It also describes options we provide for you to access, update or otherwise take control of your personal data that we hold.

Please take time to read this privacy notice in full and if you have questions you may reach our Data Protection Officer ("DPO") by contacting us at mail@encompassstraining.co.uk.

Information we collect about you

When booking with us or when you work for us, inquire or provide an evaluation the following personal data may be collected directly from you. Where children are using the facilities as part of a school trip, the information will be collected from parents via the participating school.

- Identity Data: Name, Email Address, Organisation, Job Title etc.
- *Health Data: Any medical conditions or specific medical needs, any relevant recent illness.
- *Dietary needs: Due to food allergies, religion or philosophical beliefs.
- Contact Data: Billing Address, Email Address, Telephone Numbers, emergency contact information.
- Financial Data: Bank Details for refunds, changes for payments
- Password recovery Data: Security Question/ Answer for password retrieval



Training SW Ltd

Encompass

Great Potheridge House, Merton, Okehampton, Devon, EX20 3DN
Telephone 01805 603003 or 07711 184116
www.encompassstraining.co.uk
email mail@encompassstraining.co.uk



- Transaction Data: Details of bookings made, date and time, when payment was received.
- Technical Data: Where you came to our website from, how often you visit and use our website, the devices you used, relevant IP address, operating system and version, web browser and version, and geographic location
- CCTV: For everyone's safety there is CCTV on site that will capture images of visitors. Cameras are visible and there are clear signs identifying where recording is taking place.

Data marked with a * is classed as special category data. Although we do not need to know the reason for your dietary need, we understand that the need may reveal or indicate information about you that is considered as special category.

How we utilise your information

We will use your personal data for the following purposes:

- Enter into a contract with the customer when a booking is made in accordance to our terms & conditions
- Make sure we have been paid in full for a booking
- Charge for any subsequent repairs following a stay
- Be able to refund money for cancellations or changes in bookings in accordance with our terms and conditions
- Contact the customer in relation to their booking
- With consent, and optionally ask them for feedback about the service that we offer
- Ensure that medical requirements can be taken into account when running activities.
- To ensure the safety and wellbeing of any person requiring medical attention



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- To ensure that any dietary needs are catered for safely
- To ensure that we know who and how many people are staying with us for legal and safety reason such as fire safety role call list.
- To fulfil our legal duty of care to our guests and loco parentis obligations for unaccompanied under 18's year olds.

Our lawful bases for handling your personal data in the above ways are: (1) because it is necessary for performance of a contract with you and your group members; (2) because it is a legal obligation upon us; or (3) because we have obtained consent. Where we are relying upon your consent, you have right to withdraw such consent at any time by contacting us at encompasstraining@yahoo.com. 4) Because it is in our or a third party's Legitimate Interest and those interests are not overridden by the interests or fundamental rights and freedoms of the data subject.

Our condition for processing special category data is explicit consent. We will not process this information without your consent. Providing this special category data is unlikely to affect your or your child's (where applicable) opportunity of taking part in an activity, however, it may be essential to allow us to manage participation safely. Where consent is given you have the right to withdraw this at any time by contacting us at encompasstraining@yahoo.com

Why we process your information

- We process personal information to enable us to:
- Enter into a booking contract with you or the organisation that is booking on your behalf.
- Provide a service to your group or you, or have a service provided for us
- To ensure the safety and wellbeing of your group or you
- Manage our employees



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- Maintain our own accounts and records
- Fulfil our legal obligations

How we share your information

We may share your personal information (as appropriate) with the following:

- Our employees
- A subset is shared with employees and contractors, as required, working at the centre
- Our book keeper/accountant and auditor who prepares our accounts and returns the data to us once completed
- Debt collection services

How you can access, update or delete your data

Most of the personal information held by us is kept locked away or stored on password protected computers. Updates and deletion requests to personal data can be done by contacting our office encompasstraining@yahoo.com. Changes are completed within approx 48 hours.

If you make a request to delete your personal data and that data is necessary for a booking, the request will be honoured only to the extent it is no longer necessary or required for our legitimate business purposes or legal or contractual record keeping requirements

How we secure and store your data

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilisation of encryption where appropriate.



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- Secured on secure file server, accessed by specific domain users only
- The server is on-site in a secure server room
- The computers in the office are domain password protected; the office is restricted access and locked when not in use.
- By using secure email services
- If supplied as a hard copy documents are stored in filing cabinets in a locked office at the centre
- Only the Director, the Centre Manager, IT manager and bookkeeper have access to all data. Instructors (including freelancers) have access to certain data.
- All data issued to instructors is collected back in at the end of a programme and destroyed.

How long we keep your personal data

Data is kept for 5 years to comply with our legal obligations and to maintain adequate and accurate business and financial records. Data is then destroyed (if paper copy) or deleted.

If you were involved in an incident during an activity or whilst visiting our site, your information, including your special category data will be retained:

- Children: until a young person reaches age 21
- Adults: for 3 years following the incident

CCTV images are deleted and overwritten on a rolling 30 day basis.

What are your rights?

As a Data Subject, you have the following rights:

- The right to request a copy of all personal data we hold about you



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- The right to request correction of personal data we hold about you if it incorrect or incomplete
- The right to deletion of personal data we hold about you where there is no compelling reason for us to continue to hold it
- The right to restrict our data processing activities
- The right to request transfer of your personal data to a third party
- The right to object to processing if the lawful basis is legitimate interest or performance of a task in the public interest

The right to file a complaint with the ICO (www.ico.org.uk). If you wish to raise a complaint or have a query on how we have handled your personal data, you can contact our DPO who will investigate the matter on encompasstraining@yahoo.com



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