



Fearless Adventures Academy - Trading as 'Basecamp' GDPR Policy - 01st June 2023

POLICY APPROVAL

Approval Required Indicate with a tick (✓)

Yes ✓

No

Approval Panel Approved by Name: Amy Wild

Signature: Amy Wild

Date: 01st June 2023

Policy Review Date May 2024

GDPR Policy Statement

1.1 Policy Statement Fearless Adventures Academy - Trading as 'Basecamp' is committed to protecting the privacy and security of personal information. This policy outlines how we collect and use personal information in accordance with the General Data Protection Regulation (GDPR) and other UK data protection laws.

o As a Data Processor and Data Collector, we are responsible for determining how we hold and use personal information. We also process data on behalf of Data Collectors that we subcontract from.

o This policy explains the personal data we hold, how we share it, how long we keep it, and the legal rights of data subjects (living individuals identified or identifiable) in relation to their personal data.

o Full compliance with this policy is mandatory, and any breach may result in disciplinary action.

o Employees have an obligation to ensure that they do not disclose or release sensitive personal information to unauthorised individuals.

1.2 Responsibility for the GDPR Policy o The Leadership team at Fearless Adventures Academy - Trading as 'Basecamp' has overall responsibility for the effective operation of this policy.

o The day-to-day responsibility for operating and maintaining this policy lies with the Data Protection Officer (DPO), currently held by Amy Wild.

1.3 GDPR Policy Principles

o We will comply with the GDPR, which states that personal information we hold must be:

- Used lawfully, fairly, and transparently.
- Collected only for specified, explicit, and legitimate purposes, clearly explained to data subjects, and not used in any incompatible way. This does not include anonymous data where the identity has been removed.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Processed in a secure manner to maintain confidentiality. o Fearless Adventures Academy - Trading as 'Basecamp' is responsible for demonstrating compliance with the data protection principles.

1.4 Consent

o We process data based on one or more lawful bases as set out in the GDPR, which includes obtaining consent.

o Consent is given when a data subject clearly indicates agreement, either through a statement or positive action. Consent must be actively given, and silence, pre-ticked boxes, or inactivity cannot be considered as valid consent.

o If consent is given in a document covering other matters, the consent must be separate and clearly distinguishable.

o Data subjects have the right to withdraw consent at any time, and their withdrawal should be promptly honoured.

o Explicit consent is usually required for processing sensitive personal data, automated decision-making, and cross-border data transfers. o We maintain records of all consents obtained to demonstrate compliance with consent requirements.

1.5 Information we Hold

o Personal data refers to any information about a data subject that can identify them. Anonymous data, where identity has been removed, is excluded.

o The categories of personal information we may collect, store, and use about learners in relation to Training Programme(s) include:

- Personal contact details (name, title, addresses, telephone numbers, personal email addresses)
- Date of birth
- Gender
- Next of kin and emergency contact information
- Proof of identity details (passport or other identification)
- Employment status and details
- Previous qualifications and experience
- Residency status in the UK
- Care leaver or Education & Health Care Plan status
- Health information, including medical conditions, learning difficulties, and disability status
- Information about race, religion, nationality, ethnicity, sexual orientation, and criminal convictions

o Prospective learners who express interest in our Training Programme(s) may provide the following personal information:

- Name
- Email address
- Location
- Course interest
- Telephone number
- Date of birth
- Job role
- Additional contact details

o Prospective learners who apply for our Training Programme(s) may provide the following personal information:

- Name
- Email address
- Date of birth
- Gender
- Address
- Telephone number
- Qualifications and education history
- Job role
- Additional contact details

o Personal information may also be collected from parents/guardians of learners, including:

- Personal contact details (name, title, addresses, telephone numbers, personal email addresses)

o For prospective employees joining Fearless Adventures Academy - Trading as 'Basecamp,' the following personal data may be collected, stored, and used:

- Full name
- Address
- Contact numbers
- Email address