



Privacy Notice – APL

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General Information

This privacy notice tells you what to expect us to do with your personal information when you interact with Ardingly Projects Ltd (APL) for example by making an enquiry in using the College facilities, Ardingly Active, and/or event services.

A privacy notice tells you:

- why we are able to process your information;
- what purpose we are processing it for;
- how we process your information;
- whether you have to provide it to us;
- how long we store it for;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and
- whether we do automated decision-making or profiling.

Ardingly Projects Ltd's Contact Details



Ardingly Projects Ltd is responsible for the personal information we process.

There are many ways you can contact us, including by phone, email and post.

Our postal address:

Ardingly Projects Ltd
Ardingly College
College Road
Ardingly
Haywards Heath
West Sussex
RH17 6SQ
Telephone number: +44 (0) 1444 893030

Our Data Protection Contact Details

Our point of contact for data protection related queries is the College  Privacy Officer. You can contact them at  dataprotection@ardingly.com or via our postal address.



How do we get Information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- your child attends or has attended an Ardingly Active Camp, Sports Camp or Swim School
- you have made an enquiry, using our online form in relation to our Facility Hire, Events, Weddings or Residential services
- you have signed up to be a Ardingly Active Gym Membership
- you subscribe to receive our Ardingly Active Newsletters
- you have registered an online account with **OpenPlay** our online booking system

We also receive personal information indirectly, in the following scenarios:

- from other academic institutions

Information we store

- **Personal information** (such as name, address, demographic and other contact details);
- **Characteristics** (such as gender, ethnicity, language, nationality, religion and country of birth);
- **Medical information** (such as dietary requirements, allergy information & health conditions)
- **Health & Safety information** (such as records of minor injuries and information that is required to comply with the Health & Safety Executive (HSE) RIDDOR requirements.
- **Financial information** such as bank details; credit/debit card **details**
- **Static and moving images** (such as photographs of children that attend our Ardingly Active Camps, Theme Weeks, Sports Camps and Specialised courses along with CCTV recordings when you visit our site).



Why we collect and use personal information

We collect and use personal information, for the following purposes:

- to enable APL in processing your bookings & enquiries
- to collect feedback from individuals
- to assess and improve the quality of our services.
- to enable us to promote Ardingly Active Services
- to collect fees from bookings
- to meet the statutory requirements in relation to GDPR and Data Protection.

Under the Data Protection Act (2018) and the included reference to the GDPR, the lawful bases we rely on for processing information are:

1. Clause (b), Article 6 of the General Data Protection Regulation:

“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

This lawful basis is our grounds for processing data in support of the provision of our service and appropriate pastoral care.

2. Clause (c), Article 6 of the General Data Protection Regulation:

“processing is necessary for compliance with a legal obligation to which the controller is subject”

This lawful basis is our grounds for processing data to meet the duties placed upon us in regards to Health and Safety and ensuring sufficient insurance coverage

3. Clause (d), Article 6 of the General Data Protection Regulation:

“processing is necessary in order to protect the vital interests of the data subject or of another natural person”

This lawful basis is our grounds for processing data to keep young people safe.

4. Clause (d), Article 6 of the General Data Protection Regulation:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”

This lawful basis is our grounds for processing data to assess and improve our services; and to enable us to promote Ardingly Projects Ltd.

In addition, concerning any special category data, which is defined by Article 9 of the General Data Protection Regulation as:

“racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”

The following lawful bases are our grounds for processing special category data.

1. Clause (2) (b) Article 9 of the General Data Protection Regulation:



“processing necessary for carrying out obligations and exercising specific rights of the controller or of the data subject in the field of ... social protection law”

This lawful basis is our grounds to process data for safeguarding purposes.

2. Clause (2) (a), Article 9 of the General Data Protection Regulation:

“the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;”

At the appropriate time therefore, we will ask parents/guardians for explicit consent for the processing of the special category data.



How we process your personal information

Automated Decision Making:

- Ardingly Projects Ltd does not use any automated processes in making decisions about data subjects.

Document Retention:

- Ardingly Projects Ltd's approach to data retention is detailed in College's Data Storage and Retention Policy. Ask the College Privacy Officer if you would like to see any of our policies and procedures.

Data Disposal:

- Ardingly Projects Ltd's approach to data disposal is detailed in the College's Data Storage and Retention Policy.

Computer Security and User Access Control:

- The College provides details about our security measures in the Information Governance and Compliance Policy and other policies referenced in that document.

Guidelines, Training and Expectations of our Staff who work with your Personal Data:

- Ardingly Projects Ltd provides details about our security measures in the Information Governance and Compliance Policy and other policies referenced in that document.

Data Breaches:

- Ardingly Projects Ltd approach to a data breach is detailed in the Data Breach Policy.

Data Transfer and Encryption:

- Ardingly Projects Ltd approach to a data transfer is detailed in the Data Sharing Policy.

EEA Data Transfers to a Third Country

If you are based within the European Economic Area (EEA), by providing us with your personal data you are agreeing to transfer the data to a controller based in a third country. We will process and retain this data in accordance with UK legislation under the UK General Data Protection Regulation and the Data Protection Act (2018).



Your Data Protection Rights

Under data protection law we are required to make you aware of your rights. The rights available to you depend on our reason for processing your information.

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here.](#)

Your right to rectification

You have the right to ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)

Your right to object to processing

You have the right to object to processing if it causes you or another person damage or distress or if we are using the data for direct marketing purposes. [You can read more about this right here.](#)

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)

You are not required to pay any charge for exercising your rights.

Please contact us at dataprotection@ardingly.com if you wish to exercise a data protection right or contact our helpline on +44 (0) 1444 893000.



Sharing your information

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They may share your personal information with another third party organisation but only as specifically agreed with us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example, under a court order or where we cooperate with regulatory bodies in order to further their, or our, objectives. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information. We will not share your information with any third parties for the purposes of direct marketing.

We routinely share information with:

- Ardingly Active Staff
- Ardingly Projects Staff
- Leisure Manager
- Organisations which provide financial services (such as Square & OpenPlay)
- Organisations which provide communication services (such as Mailchimp)

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Complaints

If you have a concern or complaint about the way we are collecting or using your personal data, you may raise your concern with us or directly with the Information Commissioner's Office at <https://ico.org.uk/concerns/>