



GENERAL DATA PROTECTION REGULATIONS POLICY

Owner: Mary Reynolds. **Date for Review:** Feb 2025

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GENERAL DATA PROTECTION REGULATIONS POLICY

1. General

1.1 Mount Cook Adventure Centre will often handle and store personal information and is therefore legally obliged to protect that information under the General Data Protection Act.

1.2 Mount Cook is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

2. Fair and Lawful

Mount Cook collects and processes data fairly and lawfully by informing all data subjects of the reasons for data collection. The purposes for which data is held, the recipients of the data and the data subject's right of access, are stated in our privacy statement which is accessible throughout our website. If details are given verbally, the person collecting will explain the issues before obtaining the information so that the individual is aware.

3. Purposes

Mount Cook will not use personal information beyond the reasons stated in our privacy statement. In the unlikely event that we need to use data for a different reason than originally stated. We will contact the individual to confirm they are aware and happy for this to be carried out.

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4. Adequacy

Data held about data subjects will be adequate, relevant and not excessive in relation to the purpose it is being held. To ensure compliance with this principle, Mount Cook will check records for missing, irrelevant or seemingly excessive information and may contact data subjects to verify certain items of data if necessary.

5. Accuracy

Data held will be as accurate and up to date as is reasonably possible. If a data subject informs Mount Cook of a change in circumstances their record will be updated within a reasonable time scale.

6. Retention

Data held about data subjects will not be kept for longer than necessary for the purposes registered. It is the duty of Mount Cook to ensure that obsolete data is properly erased. Sensitive data; medical and dietary details will be archived and stored on our secure cloud storage system. These may be held on file for up to 7 years. If we hold information about under 18-year-olds we may keep this data for up to the age of 21 years as a claim could be made at the age of 21. Beyond this date all files will be deleted. All paper copies will be destroyed once we have transferred them onto the cloud. Financial data will be stored on our secure accounting software and our booking system for up to 6 years.

7. Rights

7.1 As an individual you have a right to:

- Be informed on why we collect, process and hold your data, this is covered in our privacy policy
- Request access to a copy of the records Mount Cook hold on you
- Object to processing that is likely to cause or is causing distress
- Prevent direct marketing
- Object to decisions being taken by automated means
- Have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Act
- Request erasure of your personal data

7.2 Processing subject access requests

You have the right to request the following information:

- whether any of your personal data is being processed
- A description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people
- A copy of the information comprising the data; and given details of the source of the data (where this is available).

All requests must be made through emailing explore@mountcook.uk or posting a letter to Mount Cook Adventure Centre, Porter Lane, Middleton-by-Wirksworth, Matlock, Derbyshire, DE4 4LS. Mount Cook will endeavour to get all information to you within 1 month. If the request is manifestly unfounded or excessive Mount Cook has the right to

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refuse; in this case the individual has the right to complain to a supervisory authority or judicial remedy.

8. Data Security

8.1 Mount Cook have put appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed by any unauthorised personnel. We use permission restrictions on our online booking system and encrypted server to ensure only the relevant staff have access to personal data. Personal data will only be accessed for the purposes stated in our privacy statement. All Mount Cook staff and sub-contractors who have access to this have agreed to the Data Security Policy, which states that they must not share or copy any information.

9. Data Breaches

9.1 We have procedures in place to deal with data breaches and will always notify the individual of any incidents.



Steve Turner

Chief Executive Officer

Mount Cook Adventure Centre