

## Escape Surf School Privacy Policy

This website is operated by Young Trading, LLP (trading as Escape Surf School) ("**Young Trading LLP**") registered in England and Wales with company number OC412003 and whose registered office address is at 6 Treviglas Close, Newquay, Cornwall. At Escape Surf School we are committed to protecting and preserving the privacy of our visitors when visiting our site or communicating electronically with us. This Privacy Policy applies to all Companies that are held under Young Trading

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure. Whilst we will keep all of your personal information confidential, we reserve the right to disclose this information in the circumstances as set out within this policy. We confirm that we will keep the information on a secure server and that we will comply fully with all applicable UK Data Protection legislation and regulations in force from time to time.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [marketing@escapesurfschool.co.uk](mailto:marketing@escapesurfschool.co.uk) or by writing to Marketing Team, Escape Surf School, 35 Fore Street, Newquay. TR7 1HD

### How do we collect information from you?

We obtain information about you when you use our website, for example, when you contact us about services, if you directly give us any information via forms, if you make a booking or purchase or if you sign up to receive email newsletters.

### What type of information is collected from you?

In running and operating this website, we may collect and process certain data and information relating to you and your use of this site. Your privacy is important to us and we confirm that we will never release your personal details to any third party for their mailing or marketing purposes. The data that we collect is detailed below:

- Information you provide in order to enter a competition or promotion via the site, complete a survey, or if you report a problem with the site.
- Details of visits to our website and the pages and resources that are accessed, including but not limited to, traffic data, location data and other communication data that may assist us in understanding how visitors use the website. This may also include the resources that you access, and information about where you are on the internet including the domain type, IP address and URL that you came from. This information is collected and used for our internal research purposes and to improve our customer service.
- The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. This information is recorded and sent to third-party processors for the purposes of data analysis, to improve our marketing efforts and for targeting specific services and products.

- Information you provide to us by sending us a message through our website and information provided to us when you communicate with us electronically for any reason. If you contact us, we may keep a record of your email and other correspondence.
- Information that you provide us as a result of filling in forms on our website, such as registering for information or making a purchase.

If you make a purchase from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

### **IP Addresses**

We may collect information about your computer, including but not limited to (where available), your IP address, operating system and browser type for administration purposes and to produce internal reports. This is statistical data relating to a web user's browsing actions and patterns and does not specifically identify you as an individual.

### **How is your information used?**

We may use your information:

- to ensure that the content on the site is presented in the most efficient way for you and the computer that you are using;
- to enable you to participate in interactive features of the site;
- to provide you with information relating to our website, product or our services that you request from us;
- to provide you with information on other products that we feel may be of interest to you in line with those you have previously expressed an interest in via our website;
- to process a booking you have made;
- to meet our obligations arising from any contracts entered into by you and us;
- for dealing with entries into a competition;
- to seek your views or comments on the services we provide;
- to notify you about any changes to our website, including improvements, and service or product changes;
- to send you communications which you have requested and that may be of interest to you. These may include information about events, promotions, offers, job offers, information about the us and the surrounding area and replies to requests and bookings enquiries/confirmations
- for our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website;
- to administer this website; and
- if you consent, to notify you of products or special offers that may be of interest to you.

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

### **Who has access to your information?**

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

*Third Party Service Providers working on our behalf:* We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and send you email). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond Young Trading for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

*Third Party Product Providers we work in association with:*

We work with carefully selected third party organisations, including booking system providers (i.e Viking Bookings) as partner businesses, including accommodation and activity providers. When you enquire about or book with these third parties, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share required information about you with us which we will use in accordance with this Privacy Policy.

When you are using our secure online booking system, your purchase is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### **How do I opt out of marketing communications?**

You have a choice about whether or not you wish to receive information from us. We will not make contact with you unless you have opted in. If then, you no longer want to receive direct marketing communications from us about offers and events, then you can change your preferences or completely unsubscribe in one of two ways:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of marketing emails sent to you
- Email [marketing@escapesurfschool.co.uk](mailto:marketing@escapesurfschool.co.uk) and we will process your request within 7 days

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

## **Your Rights**

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [marketing@escapesurfschool.co.uk](mailto:marketing@escapesurfschool.co.uk) and we will process your request within 7 days  
You have the right to ask for a copy of the information Young Trading LLP hold about you

## **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with 128 Bit encryption on SSL across the entire website. When you are on a secure page, a lock icon will appear in the address bar of modern web browsers such as Microsoft Edge and Google Chrome. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. This automated processing is intended to evaluate certain personal aspects of an individual. We may also use your personal information to detect and reduce fraud and credit risk.

## **Use of 'cookies'**

Like many other websites, the Escape Surf School website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies are sometimes used to improve the website experience of a visitor to a website. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to pre-fill some information on forms and to enable us to see what people view on the website and for how long. The use of cookies enables us to improve our website, deliver effective marketing and offer a more personalised service.

We may also use the cookies to gather information about your general internet use to further assist us in developing our website. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive and then stored there and transferred to us where appropriate to help us to improve our website and the service that we provide to you.

It is possible to switch off cookies by adjusting your browser preferences or using a dedicated browser extension.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you were referred to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

### **Those aged 16 or under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Third Party Processing**

Young Trading LLP utilises the services of third party organisations to process your personal data. As the data controller, Young Trading LLP determines the purposes and means of the processing of your personal data. Where your data is processed by any third party on behalf of Young Trading LLP, that third party is a processor under the GDPR. We confirm that we take steps in order to ensure that this data is processed lawfully under the law in accordance with each agreement that we have in place with each processor.

This policy was last updated on May 10<sup>th</sup> 2018