

PRIVACY POLICY

The Rawles Group Limited trading as Aspire Adventures, with its registered office at the Management Centre, Bangor Business School, College Road, Bangor, LL57 2DG, takes your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on who we are, sets out the basis on which any personal information we collect from you, or that you provide to us will be processed, stored and shared by us in respect of your relationship with us as a customer or potential customer. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

This Privacy Policy covers the Rawles Group of companies, its websites, mobile applications and mobile websites (collectively referred to as the “**Platforms**”) except where you are notified of another Privacy Notice or policy by the specific Rawles Group entity who collects your personal information.

Personal information is any information that can be used to identify you as an individual. The protection of your personal information is very important to us, and we understand our responsibilities to handle your personal information with care, to keep it secure and to comply with legal requirements.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018 and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

The information we collect may be collected via our website, telephone, our social media channels (Facebook, twitter, Instagram, our questionnaires/surveys, our appointed agents, by post or in person from you.

Please read the following information carefully. You are responsible for ensuring that the other people that you are acting on behalf of (such as those included with you on a booking), are aware of the content of this Privacy Policy and you have checked with them that they agree to their personal information being given to us to make a booking on their behalf.

By making a booking or otherwise giving your personal information to us, we will transfer, store or process it as set out below. We will take all reasonably necessary steps to ensure that your personal information is treated securely and in accordance with this Privacy Policy.

This Privacy Policy applies to potential customers, historic customers and current customers.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	The Rawles Group Limited trading as Aspire Adventures
Our data privacy manager	Jason Rawles
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

What types of personal information do we collect about you:

We may collect and use the following personal information about you:

- when you make a booking with us (or you are obtaining further details about a potential adventure/service) we will usually collect your name and title, address, e-mail address, telephone number, date of birth, the names of other members of your party, third party emergency contact details, and payment card details, meal preferences and nationality. We need this information in order to customise your adventure, book the services you are requesting and deliver your specific requirements.
- we may have to ask if you have any special requirements. You may give us information concerning dietary requirements, health/medical conditions, disabilities, sexual orientation, race or religion (known as special category personal information). This special category personal information is used to determine your fitness to travel and partake in an adventure/activity; provide you with special assistance; or fulfil special dietary requirements. We may have to share that data with our third party suppliers (who help manage our business and deliver services) and transfer it outside the European Economic Area (EEA), as described in this Privacy Policy. If you do not want to provide this information to us, or after you have provided us with information you ask our data privacy manager to stop processing the information, it may mean that we will not be in a position to provide all or parts of the services you have requested. Please be aware that if we have to cancel your booking arrangements you may incur cancellation charges in accordance with our terms and conditions. Where you (or any passenger travelling) provides us with special categories of personal information you agree that you have voluntarily provided such information, and you consent (and the passenger travelling consents) for us to use that information for the purposes for which it was collected.
- If you contact us online, we may keep a record of your email correspondence.
- If you contact us by telephone, we may record and/or monitor telephone conversations for training and customer services reasons.
- If you enter a competition or complete a survey we will collect your name and relevant contact information.
- If you report a problem with our services we will collect your name and relevant contact information.
- If you make a complaint in connection with our services we will collect your name and relevant contact information.
- your transaction/payment information (but please note that full debit card and credit card information is not processed by us as it is passed through to a PCI-DSS compliant third party payment provider in accordance with good industry standard).
- your image, where it is captured by CCTV or other visual recording equipment on our owned or occupied sites.
- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our service, posting material or requesting further services. We will also ask you for information when you report a problem with our website.

Personal information we collect and/or observe about you

Based on how you have used our services in the past and your activity on our website and by telephone, we collect the following personal information from you:

- details of the services we have provided to you in the past, including your previous booking arrangements.
- details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access. We may use visitor information to measure the entry and exit points of visitors to the website and respective numbers of visitors to various pages and sections of the website and details of searches performed. We may also use this information in the future to measure the usage of advertising banners, and other "click throughs" to and from the website. We have security processes in place to ensure that your personal information is held on a central database and is not accessible by any unauthorised persons. However, persons such as IT systems suppliers may need to have access to the system from time to time.
- details of the website(s) you visited before you use a link to our website, pages visited in our website, and time spent on each. Information about your computer, or mobile device. This is statistical data about our users' browsing actions.

Personal information we collect and use for legal, compliance, regulatory and crime detection and prevention purposes

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order.

We also process your personal information for crime prevention and detection purposes.

How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, by post or email and/or via our website. However, we may also collect information:

- from another person making a booking on your behalf
- from your travel companion
- from our promotion partners
- from social media
- from a third party with your consent
- via our IT systems, eg automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email systems
- from cookies on our website – for more information on our use of cookies, please see our cookies policy
- in emergency situations, we will collect information about you indirectly from other sources where we believe this is necessary to help ensure the security of our activities/adventures. These other sources may include public registers and social media platforms.

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;

- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

There may be more than one legal basis for us processing your data depending on the specific particular purpose for which we are doing so. Please refer to the 'How to contact us' section of this policy for our contact details if you need details about the specific legal basis upon which we are relying to process your personal data where more than one ground is set out in the table below.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract. For example, to manage your booking with us, complete your adventure/travel arrangements and to take payment for your booking
To prevent and detect fraud against you	For our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Recording calls made to us so we can review how we handle calls and make any necessary improvements	For our legitimate interests
Provide you with special assistance in relation to special categories of personal information	For the performance of our contract with you or to take steps at your request before entering into a contract; to comply with our legal and regulatory obligations; with your consent
Improve our products and services	For our legitimate interests
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you

What we use your personal information for	Our reasons
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Provide you with special assistance in relation to special categories of personal information	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations With your consent
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party; with your consent, ie to promote our business to existing and former customers

What we use your personal information for	Our reasons
For debt collection and credit vetting to protect our business against financial loss	For our legitimate interests or those of a third party, ie to ensure our customers are likely to be able to pay for our products and services
To seek to protect and promote your health and safety and that of our other customers, staff and third parties	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
To seek to detect, investigate, prevent and report crime and anti-social behaviour	For our legitimate interests or those of a third party, ie to detect and prevent crime and anti-social behaviour
To obtain guest reviews To publish the guest review on our website and/or any other promotional material	For our legitimate interests or those of a third party, ie to provide its services and to improve its services With your consent, ie to inform other travellers about the quality of the service or other experiences you choose to share
For resolving complaints dealing with disputes and legal proceedings	To comply with our legal and regulatory obligations

PLEASE NOTE: If you provide your explicit consent to allow us to process your special categories of personal information, you can withdraw your consent to such processing at any time. However, you should be aware that if you choose to withdraw your consent we will tell you more about the possible consequences, including if this means that certain services can no longer be provided.

Promotional communications

If you have made an enquiry or purchase on our website or by telephone, your personal information may be used by us in the ways the law allows, to contact you by post or electronic means (email or text message) about our services, including exclusive offers, promotions or new services. We will only do this if you did not opt out of such marketing at the point where we collect your contact details.

If you have not made an enquiry or purchase, we will only send you information and offers by email or text message if you sign up (opt in) to receive such marketing.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations for marketing purposes.

We will not knowingly collect any personal information about children for the purpose of marketing without making it clear that such information should only be provided with parental consent, if this is required by applicable laws. This means that we will only use the personal information of children as far as is permitted by law where the required parental or guardian consent has been obtained.

What you need to do if you don't want to receive our promotional communications

You have the right to opt out of receiving promotional communications at any time by contacting us by email at info@aspire-advntures.com or writing to us at The Rawles Group Limited, the Management Centre, Bangor Business School, College Road, Bangor, LL57 2DG.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal information with:

We routinely share personal information with:

- any member of our Group for business purposes, (those business purposes include holding your personal information on central/shared systems for administering bookings). Our Group means our subsidiaries and our ultimate holding company and its subsidiaries.
- our suppliers, sub-contractors, business partners, freelance mountain leaders who help us to provide our services to you.
- third parties we use to help deliver our services to you, eg payment service providers Stripe and Snipcart.
- other third parties we use to help us run our business, eg marketing agencies or website hosts. These include Mailchimp and Zapier.
- Our travel partners, such as hoteliers and transport providers
- government bodies and regulatory authorities, including the Police and other crime prevention and detection agencies, and the UK Information Commissioner's Office.
- the courts and other dispute resolution arbitrators and mediators, and other parties to legal proceedings.
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers.
- credit reference agencies.
- our insurers and brokers.
- our bank.
- our card payment facilitators, that help us process customer payments and assist us in detecting and preventing fraudulent payments or bookings.

Some of those third party recipients may be based outside the European Economic Area – for further information of how we safeguard your personal information when this occurs, see 'Transferring your personal information outside of the EEA'.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We may also share personal information with external auditors, eg in relation to the audit of our accounts.

We may disclose and exchange information with law enforcement agencies, regulatory bodies and external law firms (acting on your instructions) to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

We do not sell or rent your personal information.

Where your personal information is held

Information may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

How long your personal information will be kept

Where you have made a booking or other purchase with us, your personal information will be retained to ensure we provide the best possible customer service to you. We retain your personal information for as long as is necessary for us to use your personal information as set out in this Privacy Policy. We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Policy.

Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

How do we treat personal data of children

The services offered by us are not directed at children under 16 years old. For children younger than 16 years old, the use of any of our services is only allowed with the valid consent of a parent or a guardian. In limited cases as part of a reservation, purchase of other travel-related services, or in exceptional other circumstances (such as features addressed to families), we may collect and use information of children only as provided by the parent or guardian or with their consent. If we become aware that we process information of a child under 16 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- service providers located outside the EEA;
- if you are based outside the EEA.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission.

If you would like further information please contact our data privacy manager (see 'How to contact us' below).

Your rights in relation to any personal information we hold about you

You have the following rights, which you can exercise free of charge. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances:

Request access to your personal data	The right to be provided with a copy of your personal information we hold about you We may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. That may
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	include information about your previous booking(s) or other purchases. If someone is acting on your behalf they will need to provide written and signed confirmation from you that you have given your authority to that person/company for them to make the request. We may not provide you with a copy of your personal information if it includes the personal information of other individuals or we have another lawful reason to withhold that information
Request rectification of the personal data we hold about you	The right to require us to correct any mistakes in your personal information
The right to withdraw consent	Where we rely on your consent as the legal basis for processing your personal information, as set out in section above titled ' How and why we use your personal information ', you may withdraw your consent at any time. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, please see the section titled " What you need to do if you don't want to receive our promotional communications " for further details. If you would like to withdraw your consent to us processing any special categories of personal information, please contact our data privacy manager. Please note if you ask us to stop processing this information, it may mean we won't be able to provide all or parts of the services you have requested. If we have to cancel your booking or other purchase as a result, you may incur a cancellation charge If you withdraw your consent, our use of your personal information before you withdraw is still lawful
Request erasure of your personal information	The right to require us to delete or remove your personal information where there is no good reason for us continuing to process it. In certain situations, you may ask for your personal information to be removed from our systems by e-mailing or writing to us at the address at the end of this Privacy Policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request
Request restriction of processing of your personal information	The right to require us to restrict processing of your personal information This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want to establish the accuracy of the data; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal information to you or to a third party	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party. This right only applies to automated information from which you initially provided consent to use or where we used the information to perform a contract with you.
To object to processing of your personal information	The right to object: —at any time to your personal information being processed for direct marketing (including profiling);

	—in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to our data privacy manager—see below: **‘How to contact us’**
- let us have enough information to identify you (*eg your full name, address and booking reference number, if you were the lead participant on the booking or someone else on the booking. If you have not made a booking please provide us with information of how you have communicated with us; for example have you made an adventure enquiry*)
- let us have proof of your identity and address; and
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that our data privacy manager can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This Privacy Policy was published on 25 February 2020.

We may change this Privacy Policy from time to time—when we do, we will inform you via our website.

How to contact us

Please contact our data privacy manager by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Our data privacy manager's contact details
<p>The Rawles Group Limited trading as Aspire Adventures The Management Centre, Bangor Business School, College Road, Bangor, LL57 2DG</p> <p>Email: info@aspire-adventures.com</p> <p>Tel: 01248 388556</p>	<p>Mr Jason Rawles The Rawles Group Limited trading as Aspire Adventures The Management Centre, Bangor Business School, College Road, Bangor, LL57 2DG</p> <p>Email: info@aspire-adventures.com</p> <p>Tel: 01248 388556</p>

Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).

