



## TRI-ADVENTURE PRIVACY POLICY

### 1. INTRODUCTION

Tri-Adventure is an Events company that organises and runs events in the UK.

We respect your privacy, and we are committed to protecting your personal data. This Privacy Policy will inform you about how we look after your personal data, and we will tell you about your privacy rights and how the law protects you. It applies to information we collect in relation to:

- People who use our website to enter an event
- People who use other websites to enter an event (e.g. a Listings website)
- People who enter an event on the day it is held
- People who make an online purchase from us
- People who contact us via any medium (e.g. by post, email, telephone or social media).

It is important that you read this Privacy Policy, together with any other Privacy Policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. This privacy notice supplements the other notices and is not intended to override them.

### 2. IMPORTANT INFORMATION AND WHO WE ARE

#### Controller and contact information

Tri-Adventure is the controller and is responsible for your personal data (collectively referred to as "Tri-Adventure", "we", "us" or "our" in this Privacy Policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk).

#### Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk) in the first instance.

#### Changes to the Privacy Policy and your duty to inform us of changes

We reserve the right to update this Privacy Policy at any time.

It is important that the personal data we hold about you is accurate and current. Please use our online tools to keep us informed if your personal data changes during your relationship with us.



### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

### 3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, date of birth and gender.
- **Contact Data** includes contact address, email address, social media account information and telephone numbers. This includes Emergency contact data.
- **Financial Data** includes details about payments to and from you. If you choose to pay by credit or debit card we will also ask you for your credit/debit card details. We do not hold any payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, saved responses to commonly asked event / membership questions, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Membership Data** includes details of any clubs, organisations or associations of which you are a current member.
- **Performance Data** includes, in addition to your Identity Data, details of any Tri-Adventure event in which you have participated.
- **Medical Data** includes information about your health, medical history and fitness to participate in the activities you may enter.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.



However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

If you fail to provide the Medical Data that we request in relation to a particular event, we may not permit you to be entered for that event. If this is the case, we will notify you of the decision at the time.

#### 4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You will give us your Identity, Contact, Financial, Transaction, Profile, Membership and Performance Data (as appropriate), and, where applicable, your Medical Data by completing and submitting a form through an online Entry System company (such as SI Entries), by completing a form on the day you enter an event, or by corresponding with us by email, phone or post. This includes personal data you provide when you:
  - a) apply to take part in our events
  - b) create an account on our website
  - c) subscribe to our services or publications
  - d) request marketing to be sent to you
  - e) give us some feedback
- **Third parties.** We may receive personal data about you from various third parties as set out below:
  - a) Organisations we use as an online booking portal for our Events
  - b) Analytics providers such as Google based outside the EU
  - c) Clubs, Organisations or Associations with whom you may have membership, to allow us to validate your Membership data; e.g. British Orienteering, based inside the EU

#### 5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:



- Where we need to perform the contract we are about to enter into or have entered into with you.
- The most common way we use the data is to communicate with you through emails, the Navigator newsletter, and so on.
- Where it is necessary for our legitimate interests (or those of a third party) by which we mean the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk).
- Where we need to comply with a legal or regulatory obligation we are subject to.

### **Consent and Withdrawal of Consent**

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to Medical Data, or to sending third party direct marketing communications to you via email or text message (which we do not do currently, and which we have no plans to do in the future).

You have the right to withdraw consent to marketing at any time by:

- Making use of the “unsubscribe” link in emails.
- Contacting us via any of the methods referred to in paragraph 2 above.

You have the right to withdraw consent to our processing of Medical Data at any time by emailing us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent for Medical Data provided in relation to a particular event, we may not:

- a) permit you to be entered by a Third Party for that event. We will inform you of this at that time
- b) where you have already been entered for an event, we may not allow you to participate in that event, and we will inform you of this at that time.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new participant	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Contacting you with regard to a contract between you and us	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, and to prevent fraud)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	Necessary for our legitimate interests (to define types of marketing, customer relationships and experiences customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Profile</li> </ul>	Necessary for our legitimate interests (to develop our services and grow our business)
To publish information in the Results section of our website for participants in events	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Performance</li> </ul>	Necessary for our legitimate business (to motivate and keep people informed)



### **Promotional offers from us**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information or purchased services from us or if you provided us with your details when you registered with us and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message or email sent to you, or by emailing us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



## 6. DISCLOSURES OF YOUR PERSONAL DATA

We require all third parties to whom we disclose your data in accordance with this policy to respect the security of your personal data and to treat it in accordance with the law.

We may also have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

- Service providers acting as processors based within the EU who provide webhosting, back-up and other IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. INTERNATIONAL TRANSFERS

Some of our external third parties could, in future, be based outside the European Union (EU), so their processing of your personal data would involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For
- further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.



We will make a general announcement if and when we do decide to work with Third Parties based outside the EU. Please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk) if you want further information on the specific mechanism which may be in place when transferring your personal data out of the EU.

## 8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We retain your Medical Data for 3 months following the event in respect of which it was provided.

Any data we are not required to hold for tax or other legal purposes will be held for no more than 5 years following the event for which it was gathered.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under Data Protection Laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.





- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy
  - (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
  - (d) if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
  - **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email us on [events@triadventure.co.uk](mailto:events@triadventure.co.uk)

You will not normally have to pay a fee to access your personal data (or to exercise any of the other rights). 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.



### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. DATE OF IMPLEMENTATION**

This Privacy Policy is, to the best of our belief, compliant with GDPR, and is effective from 1 May 2018.

The Policy will be reviewed periodically, to ensure it complies with the latest Data Protection legislation.