



PRIVACY & DATA POLICY

The Outward Bound Trust's privacy policy is as follows:

1. Privacy

We are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any of your personal data will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (henceforth the Act), the data controller is The Outward Bound Trust of Hackthorpe Hall, Hackthorpe, Penrith, Cumbria, CA10 2HX.

2. Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site at <http://www.outwardbound.org.uk> (our site) or our related site <http://rustyrally.org.uk>, such as your name and contact details. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information if you report a problem with our site;
- Information that you provide by filling in a hard copy form and return to us, e.g. at one of our events;
- If you contact us, we may keep a record of that correspondence;
- Details of your visits to our site 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; and
- Information that you upload to our site.

3. Information we may collect from other sources

We may collect information from publicly available sources, such as contact details and basic personal information (e.g. current employment) in order to determine your capacity to support the Trust, and to send you invitations to do so if such indications are positive, along with other fundraising communications such as event invitations.

Only the minimum information necessary for the above purposes will be collected, as a legitimate interest in accordance with the Act. We will always inform you at the earliest opportunity of this processing, which is subject to your Section 11 right to opt out at any time (see below). If you have not heard from us or submitted your details, but have received a fundraising communication containing a reference to this document, you may assume that the above case applies.

The information collected will never consist of sensitive personal data, as defined in Section 2 of the Act, without your prior informed consent.



If you have pledged a significant donation, or you have indicated that you are likely to do so, we may also collect additional information about you from a wide range of publicly available sources, in line with the Trust's due diligence policy and our responsibilities as a charity. It may be necessary in this case to process sensitive personal data, in which case it will not be disclosed to any third party, appropriate safeguards will apply, and your consent will be sought.

The above information will be used only for due diligence purposes, and will not be disclosed to any third party, or disseminated within the Trust in such a way that it is used for other purposes (e.g. fundraising).

With the exception of due diligence, the data described in this section will not be held by us for longer than two years without seeking your consent to continue processing.

4. IP addresses and Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us to:

- Estimate our audience size and usage pattern;
- Store information about your preferences, and so allow us to customise our site according to your individual interests;
- Speed up your searches; and
- Recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

5. Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.



Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. However, our site could be subject to unauthorised access and though we take steps to prevent this, we cannot guarantee that it will not occur.

6. Uses made of your personal data

We may use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer;
- To provide you with information, or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between you and us;
- To allow you to participate in interactive features of our service, when you choose to do so;
- To notify you about changes to our service;
- To send fundraising communications inviting you to support the Trust or to attend our events, in accordance with the Act and with the Privacy and Electronic Communications Regulations of 2003 (henceforth referred to as PECR), and where such communications are judged reasonable and not intrusive (data that you provide us for other purposes, e.g. making an enquiry on our website, will not be used for this purpose);
- To conduct research on you if you are a prospective donor, for due diligence purposes (as described in section 3) in accordance with our responsibilities as a charity.

7. Disclosure of your information

We may disclose information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of The Outward Bound Trust, our customers, or others.

We may also share data with a designated data processor, for example to process communications that are sent. In this case, the processor is bound by a contract to only act on our instructions, as well as to enact security equivalent to ours in regard to Principle 7 of the Act.

Apart from the circumstances above, we will never share your personal data with third parties without your explicit consent to do so.

8. External links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these



websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. Your rights – direct marketing

You have the right to prevent your personal data being processed for direct marketing (which includes fundraising communications). You may exercise this right at any time by communicating your wish to do so in writing (either email or hard copy) to The Outward Bound Trust (details below).

When you have requested the above, we aim to stop contacting you immediately; in exceptional cases, this may take up to 28 days from receiving the notice in the case of email communications, or two months in the case of post.

When exercising this right, it will aid the administrative process if you include in your message's subject line the word "unsubscribe", your name and the address/email by which you were contact. All fundraising communications from The Trust will contain further details on how to do this. We will also make every effort to act on such requests made via telephone, although we do not recommend this method as it may complicate the administrative process and lead to errors.

If you wish to opt out as described above, but do not have an email to reply to (e.g. you were contacted by post, but wish to opt out by email), you may do so by sending an email specifying your name and email address, with "unsubscribe" in the subject line, to fundraising@outwardbound.org.uk. You may also opt out by phone (020 3301 6477), or by sending a letter to that effect to The Outward Bound Trust, 4th Floor, 207 Waterloo Road, London, SE1 8XD.

Basic information (i.e. your name, relevant contact details, and date on which you requested no further contact) will be held on our in-house suppression list, to ensure that you are not contacted in the future by accident. This practice is in accordance with the Information Commissioner's guidance regarding Direct Marketing practice; this list is purely for internal administrative purposes, and will never be shown to a third party under any circumstances.

In addition, if you feel your rights as an individual under the Act or other legislation have been infringed, you have the right to complain at any time to the appropriate supervisory authority (this will generally be the Information Commissioner's Office or, in some cases, the Fundraising Regulator).

10. Your rights – access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

You may make the request in writing (either email or hard copy) to The Outward Bound Trust (details below); within 40 days of receipt of this, you will be sent a summary of:

- Whether any personal data is being processed;
- What personal data is held, the reasons it is being processed, and whether it will be given to any other organisations or people;



You will also be sent a copy of the information comprising the personal data held, and given details of the source of the data (where available).

If you submit your request via email, please send it to enquiries@outwardbound.org.uk, with the phrase "Subject Access Request" in the subject line. Sending it without this wording or to an alternative email address, such as that of an individual member of staff, will not guarantee your request prompt attention.

10. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

11. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to enquiries@outwardbound.org.uk or The Outward Bound Trust, Hackthorpe, Hackthorpe Hall, Penrith, CA10 2HX, Cumbria. The accuracy of your individual identifying information is important to us. If you change email address or any other information that we hold about you, please tell us either by email or post.