



# Cut The Mustard Club

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## Cut The Mustard Club

### Privacy Policy

This Privacy Policy explains what we do with your personal data, whether we are in the process of providing you with a quotation, answering your enquiry, confirming a booking or just keeping in regular communication with you about our services, or you are visiting our website. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. This Privacy Policy applies to the personal data of our Website Users, Enquirers, Customers, Suppliers, and other people whom we may contact in an emergency. It also applies to the emergency contacts of our Staff. It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here. If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

#### WHAT KIND OF PERSONAL DATA DO WE COLLECT?

**PARTICIPANT DATA:** In order to provide the ensure the safety and wellbeing of participants and visitors to our site, we need to obtain certain information about you. We only ask for details that will genuinely help us to ensure your safety, such as your name, contact details, emergency contact details, dietary and medical information.

**CUSTOMER DATA:** If you are a Cut The Mustard Club (CTMC) customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as:

- (i) activity and event days,
- (ii) onsite or offsite activities.

**SUPPLIER DATA:** We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). To the extent that you access our website we will also collect certain data from you. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to provide our services or, in extreme cases, may not be able to continue with our relationship.

#### HOW DO WE COLLECT YOUR PERSONAL DATA?

**PARTICIPANT DATA:** There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties.

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**CUSTOMER DATA:** There are two main ways in which we collect your personal data:

- Directly from you; and
- From third parties and other limited sources (e.g. online and offline media).

To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**SUPPLIER DATA:** We collect your personal data during the course of our work with you. To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

#### **HOW DO WE USE YOUR PERSONAL DATA?**

**PARTICIPANT DATA:** The main reason for using your personal details is to comply with health and safety legislation and to ensure the wellbeing and safety of participants whilst in our care.

**CUSTOMER DATA:** The main reason for using information about customers is to ensure that the arrangements between us can properly be implemented so that the relationship can run smoothly. The more information we have, the more bespoke we can make our service.

**SUPPLIER DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.

Please note that communications to and from the CTMC staff including emails may be reviewed as part of internal or external investigations or litigation.

#### **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

**PARTICIPANT DATA:** Primarily we will share your information with our staff to ensure your safety and wellbeing, but will not share with any other party without your expressed consent.

**CUSTOMER DATA:** Primarily we will share your information with our staff.

**SUPPLIER DATA:** Unless you specify otherwise, we may share your information with any of our customers and participants.

**WEBSITE USERS:** Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

#### **HOW DO WE SAFEGUARD YOUR PERSONAL DATA?**

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

#### **HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we may delete your personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, in connection with any anticipated litigation).

#### **HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?**

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay,

and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply. **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.

**Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information. At this point we may comply with your request or, additionally do one of the following: we may ask you to verify your identity, or ask for more information about your request; and where we are legally permitted to do so, we may decline your request, but we will explain why if we do so. **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority. If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example emails from CTMC) by clicking the unsubscribe link in the email.

#### **WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE CTMC WEBSITE?**

CTMC controls the processing of personal data on its website(s).



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