

# Walk Snowdonia

## Privacy Policy

### 1. Introduction

Walk Snowdonia is committed to protecting your privacy and handling your personal data responsibly. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our services, visit our website, or interact with us.

Please read this Privacy Policy carefully. By booking an activity with us or using our website, you acknowledge that you have read and understood this policy. If you are booking on behalf of others, you confirm that you have made them aware of this Privacy Policy.

This Privacy Policy should be read alongside our Terms and Conditions, which are available on our website.

### 2. Data Controller

Walk Snowdonia is the data controller responsible for your personal data. Our details are:

**Business Name:** Tom Hopkinson trading as Walk Snowdonia

**Address:** 1 Y Ffridd, Llanllechid, Bangor, LL57 3HP

**Email:** [info@walksnowdonia.co.uk](mailto:info@walksnowdonia.co.uk)

**Phone:** 07784530019

**Website:** [www.walksnowdonia.co.uk](http://www.walksnowdonia.co.uk)

Tom Hopkinson is the Data Privacy Manager and is responsible for overseeing questions relating to this Privacy Policy. If you have any questions, please contact us using the details above.

### 3. What Personal Data We Collect

We collect and process the following types of personal data:

#### 3.1 Identity and Contact Data

- Name
- Postal address
- Email address
- Telephone number(s)
- Emergency contact details

#### 3.2 Booking and Transaction Data

- Details of activities booked
- Booking dates and preferences
- Payment information (processed securely by our payment provider)

- Correspondence relating to your booking

### 3.3 Health and Medical Data (Special Category Data)

To ensure your safety during activities, we collect health and medical information including:

- Pre-existing medical conditions
- Injuries or illnesses that may affect participation
- Medications you are taking
- Allergies
- Fitness levels and physical ability

This is classified as 'special category data' under UK GDPR and is subject to additional protections. See Section 6 for more information.

### 3.4 Technical Data

- IP address
- Browser type and version
- Device information
- Pages visited on our website
- Cookie data (see Section 13)

### 3.5 Images

We may take photographs or videos during activities for marketing purposes. See Section 9 for more information.

## 4. How We Collect Your Data

We collect personal data through:

- **Direct interactions:** When you make a booking, complete a Consent Form, contact us by phone or email, sign up to our newsletter, or correspond with us.
- **Third parties:** When someone else makes a booking on your behalf (e.g., a group organiser, employer, or school).
- **Automated technologies:** When you visit our website, we may automatically collect technical data using cookies and similar technologies.
- **Publicly available sources:** We may collect data from publicly available sources such as Companies House or social media where relevant.

## 5. Why We Process Your Data and Our Legal Basis

Under UK GDPR, we must have a valid legal basis for processing your personal data. We rely on the following legal bases depending on the purpose:

Purpose	Legal Basis	GDPR Article
Processing your booking and delivering activities	Performance of a contract	Article 6(1)(b)

Communicating with you about your booking	Performance of a contract	Article 6(1)(b)
Processing health/medical data for your safety	Explicit consent (special category data)	Article 9(2)(a)
Sharing data with instructors for activity delivery	Legitimate interests (safe delivery of services)	Article 6(1)(f)
Retaining records for legal claims	Legitimate interests / Legal obligation	Article 6(1)(c)/(f)
Sending marketing communications	Consent	Article 6(1)(a)
Using photographs for marketing	Legitimate interests / Consent	Article 6(1)(a)/(f)
Website analytics and improvement	Legitimate interests	Article 6(1)(f)
Responding to enquiries	Legitimate interests	Article 6(1)(f)
Complying with legal obligations	Legal obligation	Article 6(1)(c)

Where we rely on legitimate interests, we have conducted a balancing test to ensure our interests do not override your rights and freedoms.

## 6. Special Category Data (Health and Medical Information)

Health and medical information is classified as 'special category data' under UK GDPR and requires additional protection.

### 6.1 Why We Collect It

We collect health and medical information solely to ensure your safe participation in our activities. This information helps us:

- Assess whether an activity is suitable for you
- Make reasonable adjustments where possible
- Respond appropriately in a medical emergency
- Brief instructors on any relevant safety considerations

### 6.2 How We Protect It

- We only share medical information with instructors and staff on a strict need-to-know basis
- Information is shared only to the extent necessary to safeguard your health and safety
- We will not disclose medical information to third parties except where required by law or in an emergency (e.g., to medical professionals)
- Medical information is stored securely with restricted access

## **6.3 Your Consent**

By completing our Consent Form, you provide explicit consent for us to process your health and medical data for the purposes described above. You may withdraw this consent at any time, but please note that if you do so, we may be unable to allow you to participate in activities for safety reasons.

## **7. Children's Data**

We provide activities for participants under the age of 18, including Duke of Edinburgh expeditions and family activities.

### **7.1 Parental Consent**

- For participants under 18, Consent Forms must be completed by a parent or legal guardian
- The parent or guardian is responsible for ensuring the child understands how their data will be used
- For under-13s, we require verifiable parental consent before processing any personal data

### **7.2 Additional Protections**

- We do not photograph or film participants under 18 without parental consent
- We do not share identifiable images of children on social media without consent
- Children's data is retained in accordance with our retention policy (see Section 10), with extended periods to account for limitation periods for legal claims

Our Child Protection and Vulnerable Adults Policy sets out our full safeguarding procedures.

## **8. Who We Share Your Data With**

We may share your personal data with the following categories of recipients:

### **8.1 Freelance Instructors**

We engage freelance instructors to deliver activities. We share relevant information with them including your name, contact details, emergency contact, and medical information where necessary for your safety. All instructors are bound by data protection obligations in their Freelance Contractor Agreement.

### **8.2 Service Providers**

- Our online booking system provider (for processing bookings)
- Our payment processor (for processing payments securely)
- Our email service provider (for sending booking confirmations and, where you have consented, marketing emails)
- Our website hosting provider

These providers process data only on our instructions and are subject to contractual obligations to keep your data secure.

### **8.3 Schools and Organisations**

For Duke of Edinburgh expeditions and corporate bookings, we may share relevant information with the supervising school, organisation, or employer as necessary for the coordination and safe delivery of the activity.

#### **8.4 Emergency Services and Medical Professionals**

In an emergency, we may share your personal and medical information with emergency services, mountain rescue, hospitals, or other medical professionals as necessary to protect your vital interests.

#### **8.5 Insurance and Legal**

We may share your data with our insurers in the event of a claim, or with legal advisers if we need to establish, exercise, or defend legal claims.

#### **8.6 Law Enforcement and Regulators**

We may disclose your data where required by law, court order, or regulatory authority.

We will never sell your personal data to third parties.

### **9. Photography and Marketing**

#### **9.1 Photographs During Activities**

We may take photographs or videos during activities for marketing purposes, including use on our website ([www.walksnowdonia.co.uk](http://www.walksnowdonia.co.uk)) and social media platforms including Facebook, Instagram, YouTube, TikTok, and LinkedIn.

#### **9.2 Opting Out**

If you do not wish to be photographed, please inform your instructor before the activity begins, or contact us in writing. We will remove any photographs of you from our marketing materials upon request.

#### **9.3 Children**

We do not photograph or film participants under 18 without parental consent. We do not share identifiable images of children without consent.

#### **9.4 Marketing Communications**

If you sign up to our newsletter or opt in on the booking form, you are agreeing to receive marketing emails from us. Marketing consent is entirely voluntary and separate from your booking.

You can unsubscribe from marketing emails at any time by clicking the 'unsubscribe' link in any email, or by contacting us directly. Unsubscribing from marketing will not affect service communications about your bookings.

### **10. How Long We Keep Your Data**

We retain your personal data only for as long as necessary for the purposes for which it was collected, or as required by law. Our standard retention periods are:

Data Type	Retention Period
Booking and activity records (adult participants)	6 years from date of activity
Booking and activity records (participants under 18)	Until the participant reaches age 21 (3 years after turning 18)
Medical and health data	Same as booking records (required for legal claims)
Incident reports	10 years (or until participant under 18 reaches age 21, whichever is longer)
Marketing preferences	Until you unsubscribe or ask us to delete
Website analytics data	26 months (anonymised)
Enquiries (no booking made)	2 years

These retention periods reflect the limitation periods for legal claims under UK law and our insurance requirements. Personal injury claims involving adults must generally be brought within 3 years, but claims involving children can be brought up to 3 years after they turn 18. Contract claims have a 6-year limitation period.

At the end of the retention period, your data will be securely deleted or anonymised.

## 11. Data Security

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it, including:

- Password protection and access controls on our systems
- Secure, encrypted connections for online bookings and payments
- Restricted access to personal data on a need-to-know basis
- Contractual obligations on freelance instructors and service providers
- Secure storage and disposal of physical documents

While we take all reasonable steps to protect your data, no method of transmission over the internet or electronic storage is 100% secure. If you have reason to believe your data has been compromised, please contact us immediately.

## 12. International Data Transfers

Your personal data is primarily stored and processed within the United Kingdom. However, some of our service providers (such as email and website hosting services) may process data in other countries.

Where data is transferred outside the UK, we ensure appropriate safeguards are in place, such as:

- Transfers to countries with an adequacy decision from the UK Government
- Standard contractual clauses approved by the Information Commissioner's Office
- Other lawful transfer mechanisms under UK GDPR

If you would like more information about international transfers, please contact us.

## 13. Cookies

Our website uses cookies to improve your experience and help us understand how visitors use our site.

### 13.1 What Are Cookies?

Cookies are small text files placed on your device when you visit a website. They help the website remember your preferences and understand how you interact with the site.

### 13.2 Cookies We Use

- **Essential cookies:** Necessary for the website to function (e.g., remembering items in your booking).
- **Analytics cookies:** Help us understand how visitors use our website (e.g., Google Analytics). These collect anonymised data.
- **Marketing cookies:** Used to track visitors across websites to display relevant advertisements (if applicable).

### 13.3 Managing Cookies

You can control and manage cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of our website.

For more information about cookies and how to manage them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 14. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data:

- **Right of Access:** You can request a copy of the personal data we hold about you (a 'Subject Access Request'). We will respond within one month.
- **Right to Rectification:** You can ask us to correct any inaccurate or incomplete data.
- **Right to Erasure:** You can ask us to delete your personal data in certain circumstances (the 'right to be forgotten'). However, we may need to retain data for legal claims or other legal obligations.
- **Right to Restrict Processing:** You can ask us to limit how we use your data in certain circumstances.
- **Right to Data Portability:** You can ask us to provide your data in a structured, commonly used format so you can transfer it to another organisation.
- **Right to Object:** You can object to processing based on legitimate interests or for direct marketing purposes.
- **Right to Withdraw Consent:** Where we rely on your consent, you can withdraw it at any time. This will not affect the lawfulness of processing before withdrawal.
- **Rights Related to Automated Decision-Making:** You have the right not to be subject to decisions based solely on automated processing. We do not currently make automated decisions about you.

To exercise any of these rights, please contact us at [info@walksnowdonia.co.uk](mailto:info@walksnowdonia.co.uk) or 07784530019. We may need to verify your identity before processing your request.

We will respond to most requests within one month. If your request is complex, we may extend this by up to two months, but we will let you know.

There is no fee for most requests, but we may charge a reasonable fee if your request is clearly unfounded or excessive.

## 15. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so we can try to resolve the issue.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection:

**Website:** [www.ico.org.uk](http://www.ico.org.uk)

**Phone:** 0303 123 1113

**Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would appreciate the opportunity to address your concerns before you contact the ICO, but you are entitled to contact them at any time.

## 16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons.

The current version will always be available on our website. We will notify you of significant changes by email (if we have your contact details) or by a prominent notice on our website.

This policy was last updated in January 2026.

## 17. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

**Data Privacy Manager:** Tom Hopkinson

**Email:** [info@walksnowdonia.co.uk](mailto:info@walksnowdonia.co.uk)

**Phone:** 07784530019

**Address:** 1 Y Ffridd, Llanllechid, Bangor, LL57 3HP