



# Rainbow Mill (NVC) Community Camp

## Attendee Privacy Notice

This privacy notice tells you what to expect us to do with your personal information. It includes our website privacy notice within it.

### **What information we may collect, use, and why**

We collect personal information that you voluntarily provide to us when you book a place at Camp or express an interest in obtaining information about the Camp, when you participate in Camp or associated events or otherwise when you contact us.

This is information you provide us directly either about yourself and or on behalf of children and young people under the age of 18 that you are parent or guardian to.

The personal information that we collect depends on the context of your interactions with us.

We collect personal information in order to run the Camp (services and goods), to receive funding and organise Camp activities, to provide Camp updates or for marketing purposes, for research purposes to continually improve camp approach and experience and for dealing with queries, complaints or claims.

The personal information we collect may include the following:

### **Personal Information Provided by You.**

- Names and contact details
- Pronoun preferences
- Addresses
- Recorded images, such as photos or videos
- Dietary information (including allergies and health conditions)

- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about support requirements
- Payment details (including card or bank information for transfers and direct debits)
- Information relating to compliments or complaints
- Health information
- Previous NVC experiences/knowledge
- Marketing preferences
- Purchase history
- Witness statements and contact details (in the event of an accident or incident on Camp)
- Relevant information from previous investigations (in the event of an accident or incident on Camp)
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Annual feedback forms

### **How do we use your information?**

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you (a place at camp in return for consideration / a sum of money), compliance with any legal obligations upon us, and/or your consent.

We use personal information collected via our booking processes for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate creation of an attendee register in order to run Camp.
- To implement necessary application / booking processes in the running of camp.
- To post testimonials on the Camp website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to

update, or delete your testimonial, please contact us at [rainbowmillcamp@gmail.com](mailto:rainbowmillcamp@gmail.com) and be sure to include your name, testimonial location, and contact information.

- We may use your information to request feedback and to contact you about your experience of camp.
- We may use your information in order to enable attendee-to-attendee communications with each attendee's consent.
- We may use your personal information to send you information about changes to our camp terms, conditions and policies.
- To enforce camp terms, conditions and policies for business purposes, to comply with any contractual and / or legal and regulatory requirements.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- We may use your information to fulfill and manage your booking, payments, deposits, and refunds made in relation to camp attendance.
- We may use your information to provide you to deliver and facilitate delivery of the camp.
- We may use your information to respond to your inquiries and solve any potential issues you might have with camp.
- We may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about camp or otherwise contacting us, we will collect personal information from you. You can opt out of our marketing emails at any time (see the "What are your privacy rights" below in this document).

Additionally, the RM Organising Team may need to discuss any health issues (physical, mental and / or neurological) an individual has that could impact on their ability and or any other attendees ability to a) access camp or b) experience the benefits and offers of camp in the same way as someone who does not have the same health issues. The information may be used to support a more accessible design or approach to camp, and or make a decision about safety of all attendees pre, during and after delivery of the camp. As a result, Attendees will need to be aware of any policy adopted as a result of this information, which is likely to be made accessible on the website and or social media / any marketing materials, and referred to in booking forms, which people complete when they pay their deposit. Such

policies adopted may also be referred to in any response to complaints and or dealing with relevant queries.

### **Will your information be shared with anyone?**

The processing of bookings is being coordinated internally by a small group of up to three members of the Organising Team, as such the data will remain only shared between these individuals for the purposes of implementing camp (booking/application process / payment queries etc / feedback forms etc). Some limited and anonymised information may be shared with other members of the Organising Team where necessary to ensure our legal duties are considered fully as well as adherence to RM Policies.

### **Others we may have to share personal information with**

- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media

We only share information with your consent, to comply with laws, to provide you with services (i.e., running the camp), to protect your rights, or to fulfill business obligations.

### **We may process or share your data that we hold based on the following legal basis:**

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests. We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

- **Performance of a Contract:** Where we have entered into a contract with you (i.e., your attendance at camp in exchange for consideration / a sum of money), we may process your personal information to fulfill the terms of our contract (i.e., to be able to run the camp).
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Business Transfers.** We may share or transfer your information in connection with any handover of the RM Camp responsibility to another organisation/person or group of people.

### **How long do we keep your information?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). For avoidance of doubt, this means for as long as the camp exists. All data will be deleted or anonymised if the camp discontinues for more than two years in a row.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **How do we keep your information safe?**

We aim to protect your personal information through a system of and technical security measures.

We have implemented appropriate technical security measures designed to protect the security of any personal information we process.

- Encryption allows information to be hidden so that it cannot be read without special knowledge (i.e., a password)
- Controlling access to systems, hard and soft copy records allows us to stop people who are not allowed to view your personal information from getting access to it
- Ensuring our Organising Committee is aware of how to handle information and how and when to report when something goes wrong
- Ensuring there are ways for us to access your information should something go wrong with any online/computer systems being used
- Keeping up to date with the latest security software updates on computer systems used to process and store personal information
- Wherever possible your information will not leave the UK. Some electronic database systems used may be hosted outside of the UK but within the EEA. We will inform you if any personal data is hosted or shared with 3rd parties who operate outside of the EEA and where information may be accessible outside of the UK or EEA through our Privacy notices.
- We may use **google forms** or **Microsoft forms** to acquire the data mentioned herein. Doing this electronically makes processing and collating the data easier and removes the need for paper copies. Data is exported and saved as spreadsheets and these are retained for each purpose as described herein. You can read more about google privacy policies here: <https://policies.google.com/privacy> and Microsoft privacy policies here: <https://privacy.microsoft.com/en-gb/privacystatement>

### **Website Privacy (use of cookies)**

To make the RM Camp website easier to use, we sometimes place small text files on your device (for example your iPad or laptop). These are known as 'cookies'. Most big websites do this too. Where we do this, we will ask for your consent when you visit our website.

Cookies improve things by:

- remembering the things you've chosen, so you don't have to keep re-entering them whenever you visit a new page

- remembering information you've given (for example, your address) so you don't need to keep entering it
- measuring how you use the website so we can make sure it meets your needs.

By using the RM Camp website, (unless you otherwise manage them via your device/browser) you agree that we can place these types of cookies on your device.

We do not use cookies on the RM Camp website that collect information about what other websites you visit (often referred to as privacy intrusive cookies).

Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these files as you wish using your own web browser settings.

If you wish to restrict or block cookies you can set your internet browser to do so – click on the following link for more information: [www.aboutcookies.org](http://www.aboutcookies.org).

### **Caveat**

Despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to us via the Booking Process is at your own risk. You should only transmit your personal information within a secure environment.

### **Do we collect information from minors?**

We do not actively solicit data from or market the RM Camp to children under 18 years of age, but RM Camp is a Community Camp, and by default, parents and guardians do bring children and young people under the age of 18. By submitting a Booking Form to the RM Camp you represent that you are

at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's attendance at camp and therefore our collection of their personal data within the Booking Form.

### **Do we make updates to this Notice**

Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible on the website.

### **How can you contact RM Camp about this Notice?**

If you have questions or comments about this notice, you may email us at [rainbowmillcamp@gmail.com](mailto:rainbowmillcamp@gmail.com).

### **How can you review, update or delete the data we collect?**

Based on the applicable UK law, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please email us at [rainbowmillcamp@gmail.com](mailto:rainbowmillcamp@gmail.com).

We will make reasonable endeavours to respond to your request within 30 days.

## What are your privacy rights?

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

## **The ICO's address:**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

## **Last updated**

22nd December 2024