



# On High Hills-Data Protection/Privacy Policy Updated 7<sup>th</sup> February 2019

**Our contact details for all matters relating to Data Protection are:**

**Jonty Mills**

**On High Hills**

**Whitefold Steading**

**Clunas**

**Nairn**

**IV12 5UT**

**UK**

Our contact details

**When booking we collect several types of personal data from you, including but not limited to name, address, date of birth, email address, next of kin details, and medical history.**

What type of information we have



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**This information is collected by On High Hills either via our booking from or via correspondence with clients. The Lawful Basis under the General Data Protection Regulation (GDPR) of this is for contractual purposes to enable and facilitate your booking with us, and provide you with a safe experience. Your Consent is also requested on the booking form. Examples of why this data is needed range from being able to contact you by mobile phone on the day of your booking to make last-minute arrangements, through to having medical information to hand in the event of an emergency.**

How we get the information and why we do we have it

**The information collected is used by the owner and operator of On High Hills, Jonty Mills, to facilitate your booking. It is shared only with two groups:**

- 1) When needed, freelance instructors known to On High Hills are used for instructional and guiding purposes. They require access to this information to allow them to safely fulfil the arranged activity. All freelance staff are instructed to destroy or delete all this information as soon as the contract is successfully completed, and they no longer require access to it.**
- 2) All information can also be accessed by On High Hills' designated Emergency Point of Contact. This is Anna Mills, the wife of Jonty Mills, owner of On High Hills, and is only accessed if required.**

What we do with the information



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**The information collected is stored both electronically and in hard-copy paper format. Paper records are stored in a locked filing cabinet at our location (address provided above). Electronic records (either electronic versions of the booking forms, or emails) are accessible via passcode-secured electronic devices, including smartphones and computers. It is often essential for this information to be carried whilst out in the mountains, either as a printed hard-copy, or accessible via Mobile devices such as smartphones.**

**Following the successful completion of the booking, all hard and electronic records are retained for 5 years, after which they are destroyed or deleted. Records are reviewed annually, and those which no longer require to be kept are destroyed or deleted.**

How we store your information



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**Under data protection law, you have rights including:**

**Your right of access - You have the right to ask us for copies of your personal information.**

**Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.**

**Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.**

**Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.**

**Your right to object to processing - You have the the right to object to the processing of your personal data in certain circumstances.**

**Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.**

**You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.**

**Please contact us using the contact details at the start of this document if you wish to make a request.**

Your data protection rights



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**You can also complain to the ICO if you are unhappy with how we have used your data.**

**The ICO's address:**

**Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113**



How to complain