

## 1.0 INTRODUCTION:

Highball Ltd. (“Highball”, “we”, “us”) registered company number 7848133 is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or that we receive from others, and keep it safe.

This Privacy Notice gives details of the personal information that we collect during the running of our business, how we use it, and how we keep it secure in accordance with the General Data Protection Regulation (GDPR).

## 2.0 PERSONAL INFORMATION WE COLLECT ABOUT YOU:

### 2.1 Information you provide directly to us:

- When we communicate with you (including your name, date of birth, email address, postal address, telephone number, any other personal information you provide and the content of our communications);
- When you register to use the centre (including your name, date of birth, email address, postal address, telephone number, emergency contact details);
- When you book a session or make purchases with us (including your name, date of birth, email address, transaction and payment details);
- When you visit us for a climb (including your check-in history, and images and videos of you taken while on the premises (see our Photography & Filming policy below);
- When you subscribe to our email mailing lists (including your name, email and mailing preferences);
- Other information that you choose to provide or send to us during our relationship.

### 2.2 Data we derive through your interactions with us:

- When you visit our website, we automatically collect the following types of personal information: Technical information, including the internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
- Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

## 3.0 HOW WE WILL USE YOUR PERSONAL INFORMATION:

We will only use your personal information for our legitimate business purposes as set out in this Privacy Notice. We will make it clear to you if we intend to use your information for any purpose that is not obvious.

### 3.1 How we use your data:

- To administer our events, our website and our business
- To enable your use of our services, including registration and attendance at our events
- To respond to your requests for information
- To send you email or postal mail e.g. gift cards or information that you have specifically requested
- To send invoices, reports, statements, payment reminders and collect payments from you
- To deal with any enquiries or complaints by or about you
- To understand how you (and others) are using our services and to help us improve and develop our services, including conducting internal analyses
- To ensure your safety when using our centre and enable us to provide information to emergency services and emergency contacts in case of accidents
- To keep our events and systems secure and prevent fraud
- To send you other necessary information about our services and our relationship
- To contact you about new Highball services, offers, events or news where it is legitimate for us to do so
- To otherwise manage our relationship with you or comply with health and safety or other legal obligations

- As is otherwise necessary for our legitimate business interests

We do not:

- Sell your data to third parties for their own purposes
- Use your data to send you unsolicited marketing communications

#### 4.0 WHEN WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS:

4.1 In order to ensure the effective running of our business and to provide you with the best possible service, we use various third-party services to administer and store your personal information.

These include:

- Capitan: This service is used to store and process our customer database, process bookings, and point of sale transactions. You can view their privacy policy here: <https://www.hellocapitan.com/privacy>
- Other reputable third parties used for emailing, file storage and payment transaction processing.

4.2 In special cases we may also need to share your information with other third parties, including:

- Professional advisors and insurers: We may have to provide information to our advisors as necessary in running our business
- Regulatory bodies and law enforcement: We may disclose personal information to a third party authority, such as a law enforcement or child protection agency, if legitimately required to do so
- Corporate transactions: If we sell or transfer the whole or part of our business or assets we may transfer personal information to the buyer or transferee, on the basis that it would be used in accordance with the terms of this Privacy Notice.

#### 5.0 HOW WE STORE YOUR INFORMATION AND KEEP IT SECURE:

5.1 We will take care to ensure that your personal information is secure:

- We follow good practice security protocols across our business to ensure that information is protected
- We regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to our systems
- We ensure your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers which have features to prevent unauthorised access.
- Where we need to share customer information with third parties to administer our business, we ensure that these third parties are reputable, use up to date security protocols, and have appropriate privacy policies in place.

5.2 How long your information will be held?

In accordance with the GDPR, we will not keep your personal information for longer than necessary for the permitted purposes. We regularly review the data we hold and regularly implement programmes to delete any unnecessary information from our systems.

It may be necessary to retain certain information for reasonable or legal purposes (e.g. information to prevent identity theft, unsubscribe records, accounts information, misconduct and legal disputes) even if deletion has been requested.

## 6.0 OTHER IMPORTANT INFORMATION:

### 6.1 Cookies Policy

When you browse our website we may use cookies to recognise and track users. The cookies we use do not store any personal information like your name, address or registration data, they are just used to hold a unique id that once signed in, is associated with this information.

You have the option to set your browser to reject cookies (look in the settings or help menu of your browser to find out how to do this)

Please be aware that rejecting cookies can affect certain features of our website.

### 6.2 Photography and Filming

When using our facility, you should be aware that we do take photos and videos which we use for marketing purposes, social media and our website. We also use cctv recording facilities for the safety of our customers and staff. If you would like us to remove an image which features you prominently that you are not happy with, or would like us to provide you with any footage we have recorded of you, please contact us directly.

### 6.3 Contact Us

To request information about the data we hold on you, to have this data changed or deleted or if you have any questions, queries or comments on this notice, please email [hello@highballnorwich](mailto:hello@highballnorwich) and mark it for the attention of the Data Controller and we will get back to you as soon as possible.

Please be aware that if you delete or restrict information we hold about you it may prevent you from making full use of our services and facilities.

### 6.4 Your Rights:

You have the right to withdraw your consent to use your personal information at any time whether it be the information we keep for your registration to use the centre or personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

1. Right of access – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.
2. Right of erasure – at your request, we will delete your personal information from our records as far as we are required to do so. In many cases, we would propose to suppress further communications with you, rather than delete it.
3. Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
4. Right to restrict processing – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.
5. Right to object – you have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interests basis (see paragraph 4), (ii) using your personal information for direct marketing or (iii) using your information for statistical purposes.
6. Right to data portability – to the extent required by the GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are processing using automated

means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.

7. Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation; (ii) is authorised by EU or Member State law to which the Wall is subject (as long as that law offers you sufficient protection); or (iii) is based on your explicit consent.

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Please be aware that if you delete or restrict information we hold about you it may prevent you from making full use of our services and facilities.

Changes to this Privacy Notice:

The Data Controller will regularly review and update this Privacy Notice and will ask for your consent before using your personal information in a way that is significantly different.

This notice applies from 1 May 2022

Last updated 1 May 2022

**DOCUMENT HISTORY:**

| ISSUE | DATE    | DOCUMENT NAME          | CODE  | AUTHOR                    | COMMENTS                               |
|-------|---------|------------------------|-------|---------------------------|--|
| DRAFT | 18/5/17 | Privacy Policy (Draft) | N/A   | Ben Hiscoke               |  |
| 1     | 22/5/18 | Privacy Policy         | DPP01 | Ben Hiscoke               | No changes                             |
| 1     | 23/5/19 | Privacy Policy         | DPP01 | Ben Hiscoke               | No changes                             |
| 1     | 01/6/20 | Privacy Policy         | DPP01 | Ben Hiscoke               | No changes                             |
| 2     | 31/5/22 | Privacy Policy         | DPP01 | Mike Surtees/Reece Burton | Updated for Capitan usage & Formatting |

**DOCUMENT REVIEW:**

This document is to be reviewed annually by the Data Controller with a director or a member of the management team.