

C2R Data Protection – Privacy Statement

Climb 2 Recovery understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our members and supporters and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. **Information About Us.** Climb 2 Recovery is a registered Charitable Incorporated Organisation, registered with the Charity Commission for England and Wales, number 1186493.
GDPR Representative: Joe Winch.
Email address: joe@C2R.org.

2. **What Does This Statement Cover?** This Privacy Statement explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. **What is Personal Data?** The UK's Data Protection Act (DPA) 2018 allows for the continued application of the EU General Data Protection Regulation (EU Regulation 2016/679, GDPR) legislation, which defines personal data as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5 below.

4. **What Are My Rights?** Under the GDPR, which remains relevant in the UK through the DPA, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do We Collect?** We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name.
- Contact details – email address, telephone number, home address.
- Date of birth.
- Nationality.
- Military information – service number, rank, regiment / unit, dates served.
- Relevant medical information – injuries, medication, ongoing treatment.
- Next of kin details – name, address, phone number.
- Photos – for use on our media (only with your explicit approval).
- Business name & address (in the case of sponsors or donors).

6. **How Do You Use My Personal Data?** Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your membership with Climb 2 Recovery.
- Supplying our services to you. Your personal details are required in order for us to support you.
- Personalising and tailoring our products and / or services to you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email.
- To conduct surveys.

7. **How Long Will You Keep My Personal Data?** We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for a period of five years, at the end of which we will review your data for deletion or retention – with your approval.

8. **How and Where Do You Store or Transfer My Personal Data?** Climb 2 Recovery stores your information on a double password protected and multi-factor authentication cloud folder, within a file that is also password protected. This system is built with industry-standard security technologies, employs strict policies to protect your information and is leading the industry by adopting privacy-preserving technologies like end-to-end encryption for your data. All information is stored in an encrypted format and uses secure tokens for authentication; this means that only Climb 2 Recovery can access your information, and only on devices where we are signed in. In some cases our data may be stored using third-party partners' servers but these partners don't have the keys to decrypt our data stored on their servers.

9. **Do You Share My Personal Data?** In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?** If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be sent to the email in Part 11.

We will respond to your subject access request within one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time.

11. **How Do I Contact You?** To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Joe):

Email address: joe@C2R.org.

12. **Changes to this Privacy Notice.** We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available this Privacy Notice via this website.