



## Website Privacy Policy

Wetwheels is committed to protecting your privacy, and at the same time we endeavour to use any data we collect from you to provide the best possible service. This privacy policy sets out the basis on which any personal data we collect from you online, or that you provide to us online, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This site is a UK based website and takes reasonable care to comply with requirements of the General Data Protection Regulation (Regulation (EU) 2016/679) with regard to the personal information you supply on this site.

For the purpose of the GDPR (the "Act"), the data controller is **Wetwheels Solent CIC** of Box 15, The Guard House, Gunwharf Quays, Portsmouth PO1 3TZ. Our nominated representative for the purpose of the Act is **Karen Read**.

No data transmissions over the Internet can be guaranteed to be 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

Wetwheels may occasionally modify this Website Privacy Policy, such variations becoming effective immediately upon posting to the website and by continuing to use the website, you will be deemed to accept any such variations.

Please note that Wetwheels may from time to time provide links to other sites, which may not be governed by this Website Privacy Policy and you should view the particular privacy policies of those sites for further information.

### **DATA COLLECTION**

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site <http://www.wetwheelssolent.co.uk> ("our site"). It includes information you provide when you register to use our site, request marketing information, sign up to our newsletter, contact us, pay a bill and make a donation. The information you give us may include your name, address, e-mail address and phone number, age, gender, PayPal address, confirmation of whether you are or a member of your group is a wheelchair user and whether you have a disability.

*Wetwheels Solent CIC,*

*Box 15, The Guard House, Gunwharf Quays, Portsmouth PO1 3TZ Tel: 023 92 819366 Registered Number 08451362*

<http://www.wetwheelssolent.co.uk>

- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect but do not actively monitor, technical information, including the Internet protocol (IP) address used to connect your computer to the Internet.

Any of the data above might include "special categories" of more sensitive personal information, which is Information about your health, including any medical conditions that we may need to consider when booking your trip.

We do not need your consent to process personal data where we have a legitimate business interest in doing so and/or where we are processing your personal data in order to fulfil a contractual obligation with you. However, where we collect special categories of data, we will need your consent to process this personal data and we will ask for it on the appropriate form on which we gather this information.

You submit information using these methods voluntarily, and agree to the use of the personal data you provide as described in this policy. If you give us personal information about somebody else, such as someone in your care, we will assume you have their permission to do so, and their data will also be subject to this policy.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our volunteers and service users).

### **Data collection via cookies**

Wetwheels may also collect personally identifying information using cookies. Sometimes cookies are required as part of this site's operation. We will not collect personal data about you using cookies outside of this purpose. If you prefer not to allow the use of cookies, you can change the configuration of your browser to either warn you when you receive a cookie, or to automatically reject them. You may find, however, that disabling cookies means certain areas of the site do not function correctly.

### **DATA USAGE**

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any bookings or contracts entered into between you and us and to provide you with the information and services that you request from us;

*Wetwheels Solent CIC,*

Box 15, The Guard House, Gunwharf Quays, Portsmouth PO1 3TZ Tel: 023 92 819366 Registered Number 08451362

<http://www.wetwheelssolent.co.uk>

- carrying out marketing and fundraising activities to promote the aims and ideals of Wetwheels Solent CIC;
  - to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
    - to allow you to participate in interactive features of our service, when you choose to do so;
    - as part of our efforts to keep our site safe and secure.

## **DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your personal information with any member of our Wetwheels group, which means the Wetwheels Foundation and other Wetwheels Operators.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of Wetwheels, our participants, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

The data that we collect from you will not, to the best of our knowledge, information and belief, be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). However, we do use Dropbox and Google Drive, both of which, the EU has decided, have adequate levels of data protection in place.

All information you provide to us is stored on our secure servers or those of our hosting provider.

## **DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once we are no longer legally required to retain your personal data we will retain and securely destroy your personal information.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no lawful reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation, which makes you want to object to processing on this ground.
- You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use

*Wetwheels Solent CIC,*

Box 15, The Guard House, Gunwharf Quays, Portsmouth PO1 3TZ Tel: 023 92 819366 Registered Number 08451362

<http://www.wetwheelsolent.co.uk>

your data for such. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee in respect of our admin costs in complying with your request. If your request for access is clearly unfounded or excessive, we may refuse to comply with the request in such circumstances.

### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [karen@wetwheelssolent.co.uk](mailto:karen@wetwheelssolent.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **CHANGES TO OUR WEBSITE PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [karen@wetwheelssolent.co.uk](mailto:karen@wetwheelssolent.co.uk).