

Data Protection Policy

Overview

This document represents the data protection policy of Amaquella Ltd. It is in place to demonstrate the obligations and compliance of Amaquella to the General Data Protection Regulation (GDPR) 2018.

Amaquella is a controller of data as per the definition of the regulation. This means the business requirements of Amaquella require the determination and processing of personal data of participants.

This document was produced on 23rd April 2018 and shall be reviewed annually.

Lawful Basis of Data Processing

Participant Consent Statement

As a participant in an Amaquella Tour and in agreeing to this privacy policy, you consent for all of the personal details shown above to be controlled by Amaquella Ltd and processed by Rocketpod Ltd.

This allows Amaquella to store your details and use them for the booking of elements of the tour. It also allows us to ensure you are suitably prepared for the trip. This extends to holding your passport details in the event of flight booking and medical as well as dietary requirements that may affect your ability to participate. In addition, we hold your contact details as well of those emergency contact so we can inform relevant parties in event of an emergency and can contact you with preparation information. You also provide consent to use these details for marketing of future Amaquella Tours.

You provide consent for Amaquella to share and manage your details on a Google Spreadsheet with the selected charity for the adventure, so that they are able to contact you.

At any time you have the ability to rectify or delete any or all of your details at which point we are also obliged to update our records or delete accordingly.

Marketing Consent Statement

You provide your consent for Amaquella to contact you regarding any future Amaquella Tour. You may amend or have your data deleted at any time by contacting us.

Contract

You are required to agree to the use of personal data as per the execution of the contract between Amaquella and you, the participant. It is a requirement that Amaquella captures all of the details at the point of registration to ensure suitable delivery of the tour to which the participant is signing up.

As part of the execution of the contract, Amaquella will be request any medical condition that may impede driving for those that have a driving license. Also Amaquella will need to be aware of any allergies and may hold this information if required.

User Rights

As per the regulation, a user has the following rights over their personal data, all of which are detailed below. The right to be informed, access, rectification, erasure, restrict, processing, portability and object of their data.

Inform

There are two purposes for which user will be informed over the collection of their data.

The first will be for the purpose of marketing and shall be collected at events or exhibitions of Amaquella, as well as at sign-up to trips. You are informed at the point of providing details that the information will be used for marketing purposes through the consent statement for marketing detailed above. The information will be informed as being held indefinitely.

The second case of data collection shall be where participants are entering into a contract with Amaquella as participants of one of the designated tours. The consent statement is detailed above where you, the participant, is clearly informed that data is collected as a requirement of Amaquella executing the contract.

In both instances the details of Amaquella will be made available as will as the lead individual responsible for data protection.

Access

For marketing purposes, information will be held within Amaquella's control by means of a direct contract with data processor Rocketpod. Individuals can request to be removed from the mailing list at any time, in which case their information will be removed. There will be no charge for request of access or query for any other purpose. Requests should be made to info@amaquella.co.uk

Participants will have direct access to their data through a personalised log-in.

Rectification

Amaquella will allow participants to rectify personal data by providing direct access to it through their own secure log-in to the Amaquella website.

In the case of personal data held for marketing, Amaquella can be contacted through email (info@amaquella.co.uk) and will respond as soon as reasonably possible, but legally within a month and shall adjust accordingly.

Erasure

Amaquella is aware of its obligation to provide a user the right to erasure.

For those whose details are stored for marketing purposes only, a request can be made verbally or via email or through an unsubscription to remove their details from the mailing list.

For participants who are thus provided a log-in to access their data on the Amaquella website, they will have the ability to remove their data from our system of their own accord.

Restriction of Use

Any request to restrict the use of data specifically defined in the privacy statement can be made verbally or in writing to Amaquella. Each request will be handled based individually.

Portability

Any data captured by Amaquella, as a control, must be provided in a portable format where required as part of a request. Because a participant is provided access to their own data they can use this accordingly, with no requirement from Amaquella.

While the storing of marking information can be exported in an open format upon request, the data will only consist of an email address and phone number.

Objection

An individual can object to the use of data with a suitable statement of rejection, clearly defining the particular aspect of use.

As participant data is required for the execution of the contract, this will have to be discussed on a case by case basis.

Accountability and Governance

Controller to Processor Contract

As per the obligation under the regulation, there is a contract in place between the controller of personal information, Amaquella, and the processor of information, Rocketpod.

Amaquella has selected Rocketpod as processor with due consideration of their ability to act and suitably guarantee the security of the personal data.

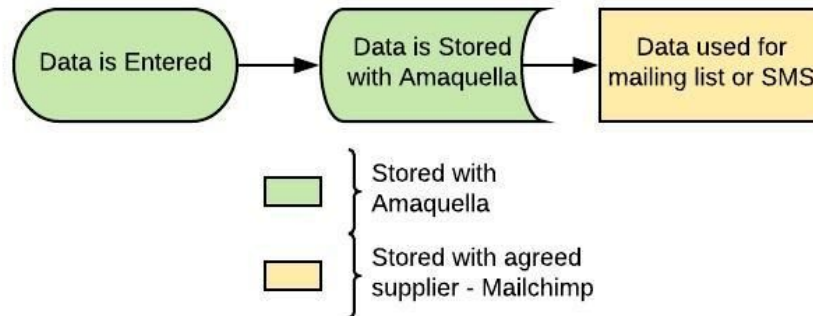
Documentation Process

The process defines how data collected by Amaquella is used and to whom it may be shared where required. There are two specific data flows in the business, namely marketing and participants with the respective data process flows shown below.

As there are no employees of Amaquella, both directors are aware of the importance of data processing and governance. Should there be any new starters at the business, then this policy shall be taught to that individual.

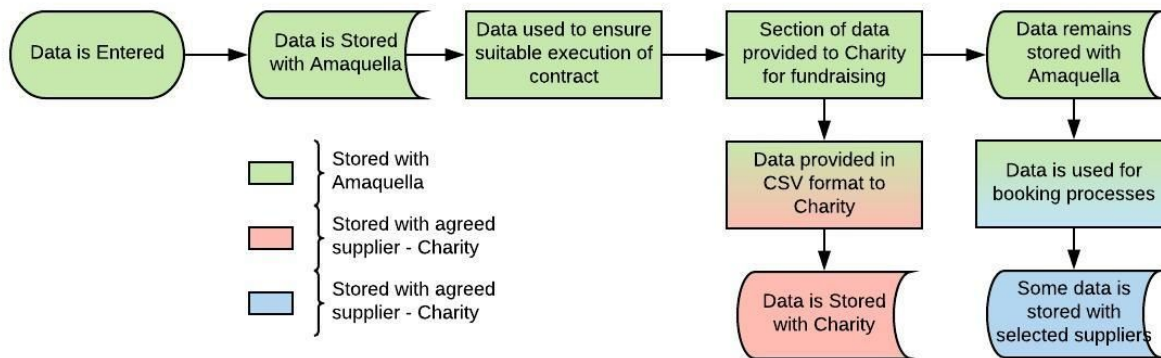
Marketing Process

The documentation process for marketing information is as follows. It is worth stating that the entry of data is done so as defined under the lawful processing of data with suitable consent or contract in place.



Participant Process

The participant process is more advanced than marketing for the purpose of sharing with the Charity when required. As per the marketing process above, data entry is done for the execution of a contract between Amaquella and the participant.



Data Protection Lead

Due to the size of the business and the simplicity of processes followed, there is no requirement for a specifically appointed protection officer. Instead the data protection lead for the business will be handled by the director, Rob Clifton.

Registration with ICO

As Amaquella has a turnover representative of a micro entity, it falls into tier 1 category of companies and has paid its obliged fee to the ICO in alignment with this.

Security

The security of data is handled by our selected data processor, Rocketpod Ltd. In alignment with the regulation an assessment has been performed and re-wording of the contract to ensure there is compliance.

There is a clear understanding of the importance for secure data processing of the data controlled by Amaquella. The security measures in place are detailed in full by Rocketpod. Considering the level of data stored, none of which fell into the special categorisation of data as per article 9 of the regulation, it was felt sufficient prevention was in place.

It is worth noting that as Amaquella works only in a virtual office and therefore does not store any documentation in hard copies on a specific site, there is considered a lower risk of theft providing sufficient cyber security is in place.

Breach

In the case of a security breach resulting in the compromise of any data, Amaquella is aware of its obligation to inform the ICO within 72 hours of becoming aware as well as any individuals in the case sensitive data is stolen.

The means of identifying a security breach have been defined by Rocketpod in their security documentation as well as a plan for rectifying such a breach. While the greatest risk of high volume theft of data would be through access to the data processor, it is also understood that Amaquella as data controller could unwittingly cause a data breach. It is for this reason both directors and controllers of data are fully aware of this policy and of their specific actions.

Any breach of data will be documented accordingly and the ICO notified through their reporting page.