

ES1. 2012

TO HIGH PLACES BY NARROW ROADS

DATA PROTECTION & PRIVACY POLICY

V3.1.1



INTRODUCTION

It has become somewhat of a soundtrack to hear companies and organisations claiming to put their customers' privacy as a number one priority but as an organisation made of members (and therefore the attributable data of those members) the BMABA takes a firm stance on Data Protection and Privacy.

For the duration of this policy document, the terms 'us', 'we', 'BMABA Group, 'BMABA', 'Association' and 'organisation' shall be a direct reference to the legal entity, BMABA Limited (Reg. 10676965) registered at Kemp House, 160 City Road, London. EC1V 2NX.

1A - COLLECTING INFORMATION

We may collect information from you, or about you, for a number of reasons as a standard part of our 'day to day' operations. This may include;

- 1. When you register to join a BMABA registered club
- 2. When you insure yourself as a member, instructor or student under the association
- 3. When you engage with our online material, website or other application processes
- 4. When you ask us to quote you for services and provisions
- 5. When you otherwise speak with us, use our websites and apps, or join as a member in any form

The information we collect may also be provided to us from a third party. In the instance of instructors, this will usually be the lead instructor. In the instance of students, this will usually also be the lead instructor.

In any situation whereby data is provided from a third party, they must already be a registered member of the association so we can ensure they are compliant with our data protection guidelines.

We only collect the minimal amount of information required to safely and accurately fulfil services and requirements, and do not hold or 'harvest' data that is not directly relevant to the purposes of the Association and/or the services at hand.

We are registered with the Information Commissioner's Office (ICO) as a data controller under the license number. ZA241917.





1B - USING YOUR PERSONAL INFORMATION

We understand that personal information is inherently sensitive and that this may also be heightened where more confidential disclosures are made – for example, pre-existing medical conditions for student registrations.

Personally identifiable information (PII) is never processed under any circumstances except where directly required and warranted in order to fulfil a requested service or product. In any case, the information used is minimal and maintained only at the necessary levels.

BMABA employ the strongest possible measures of control on data protection. Please see 1C – Protecting Information.

1C - PROTECTING INFORMATION

BMABA take our resp<mark>ons</mark>ibility to safeguarding the collection, storage and use of personal information seriously. As standard, we;

- Employ leading, enterprise level security systems for all of our hardware, software and digital space. This includes the latest technologies for both our websites and CRMs, as well as state of the art data management software for our physical offices, computers, phones and other data capable devices.
- Ensure our websites are always protected by a Secure Socket Layer (SSL) connection, to make sure the connection between your browser and our server is secure.
- We ensure two factor authentication for any staff logins to sensitive systems, to make sure even a password breach is not sufficient to gain access to personal information.
- We ensure our CRMs and other data storage systems are auditable and fully tracked, to allow us to ensure complete compliance from staff and contractors.
- We follow expert guidance and use professional services for any data protection matters, to ensure the integrity of our Data Services at all times.
- We have appointed a Data Controller who is ultimately responsible for all matters of data integrity, including both staff training and operational compliance from third party threats.





1E - COMPLAINTS, DISPUTES AND ERASERS

We understand that ultimately, data shared with the BMABA is borrowed from the person to whom it relates. Accordingly, anyone has the opportunity to check what information we hold for them, and to correct any records that are held incorrectly. Furthermore, in some cases we will be able to remove records completely if requested by the named person.

It is important to remember that under both insurance and safeguarding guidelines, we are unable to erase entirely, records pertaining to instructors, students, volunteers and other members who have either had active insurances with us, and/or have been registered to teach (or assist teaching) until 7 years has passed. We can erase erroneous service based information, but not actual records during this period.

Should any person which to query information held on them or discuss further how their personal information is held and/or processed, please contact our data controller;

BMABA Data Controller Unit K, The Old Bakery, Golden Square Petworth GU28 OAP



PAGE | 4

