



**DILYN NATUR
GUIDED BY NATURE**

Privacy Policy

Updated 1 February 2024

Introduction

Dilyn Natur Guided by Nature CIC (“We”, “Us”, “Our”) is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, we are the Data Controller.

This privacy policy (“Policy”) sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

We may change this Policy from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or about your personal information, please contact us at hello@guidedbynature.cymru.

Personal data we collect

We collect, process, store and use personal data when you book a ticket and buy any of our associated products and services to an event including your name, address and email address together with payment information. We may also collect personal data that you give to us about other people if you register them to attend an event. You agree that you have notified any other person whose personal data that you provide to us of this privacy notice and, where necessary, obtained their consent so that we can lawfully process their personal data in accordance with this policy.

All personal data that you provide to us must be true, complete and accurate. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this.

You do not need to provide us with any personal data to view our website or our event ticket shop. However, we may still collect the information set under the Data we automatically collect section of this policy, and marketing communications in accordance with the Marketing Communications section of this policy.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

The type and amount of information we collect depends on why you are providing it. This is illustrated in the table below.

Reason you provide data	Data that we collect
To make an enquiry about us, our events, or any of our other services	First name Last name What event(s) you are interested in Email address Phone number How you heard about us
To register and pay for an event or other service	Name of event Billing information
To participate in a Continuing Professional Development (CPD) course	Date of birth
To notify us of medical conditions or phobias that may affect your ability to attend or fully participate in our events	We need to understand whether you have medical conditions that may impact you while you are attending our events. Some events take place in remote, outdoor environments and our staff need to know what to do in the event that you require assistance or are taken ill. We will ask you about these when you register for an event or buy a service from us. This includes phobias, chronic health conditions (e.g. heart conditions, diabetes, vertigo, or asthma), mobility issues, and injuries that limit your ability to participate (e.g. wrist, leg, or foot injury).

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

Data we automatically collect

When you visit our event ticket shop, we, or third parties on our behalf, automatically collect and store information about your device and your activities. This information could include (a) your computer or other device's unique ID number; (b) technical information about your device such as type of device, web browser or operating system; (c) your preferences and settings such as time zone and language; and (d) statistical data about your browsing actions and patterns. We collect this information using cookies in accordance with the Cookie section of this policy and we use the information we collect on an anonymous basis to improve our event ticket shop, our events and the products and services we provide, and for analytical and research purposes.

We also allow advertisers and advertising networks to collect information about your computer or mobile device, activities, and geographic location to enable them to display targeted ads to you and provide us with anonymous information about our users' behaviour. Again, this takes place through the use of cookies in accordance with the Cookie section of this policy.

How we collect information

We may collect information from you whenever you contact us or have any involvement with us, for example when you:

- Visit our website
- Enquire about our courses or services
- Download a course prospectus
- Sign up to receive news about our courses
- Attend a meeting with us and provide us with information
- Participate in our courses and events
- Contact us in any way including online, email, phone, SMS, social media or post

Where we collect information from

We collect information:

- **When you give it to us directly:** you may provide your details when you ask us for information, apply for a course, attend our events, or contact us for any other reason.
- **When you have given other organisations permission to share it:** your information may be provided to us by other organisations if you have given them your permission. This might be your employer, or a training management outsourcing company commissioned by your employer. The information we receive from such organisations depends on your contract with them.
- **When you use our website:** information about you is recorded and stored when you use our website. See the information about the use of cookies under that heading below.

How we use your information

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- Providing you with the information or services you have asked for
- Sending you communications, with your consent, that may be of interest, including marketing information about our services and activities
- Processing event registrations
- Carrying out our obligations under any contract between us, e.g. providing you with a course, event, or other service
- Seeking your views on our services or activities, so that we can make improvements
- Maintaining our organisational records and ensuring that we know how you prefer to be contacted
- Processing job applications

Marketing Communications

If you opt in to receive marketing communications from us you consent to the processing of your data to send you such communications, which may include newsletters, blog posts, surveys and information about new events. We retain a record of your consent.

You can choose to no longer receive marketing communications by contacting us at hello@guidedbynature.cymru or clicking unsubscribe from a marketing email. If you do unsubscribe to marketing communications, it may take up to 5 business days for your new preferences to take effect. We shall therefore retain your personal data in our records for marketing purposes until you notify us that you no longer wish to receive marketing emails from us.

Lawful processing of your personal data

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- **On the basis of consent:** Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. We will ask you whether you consent to being contacted for marketing or research purposes. You may withdraw consent at any time by emailing us at admin@research-academy.co.uk. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- **On the basis of legitimate interest:** where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.
 - **Example 1:** You request information about an event and ask not to receive further marketing communications from us. It is in our legitimate interest to remind you that the event will start soon, in case you still want to apply for it. We will cease to contact you once the event in question begins.
 - **Example 2:** A third party, e.g. a prospective employer or an educational institution, asks us to verify whether or not you graduated from one of our CPD courses. We have a legitimate interest in being able to confirm or deny whether someone was a student with us.
- **On the basis of contractual obligation:** It is necessary for us to hold and use your information so that we can carry out our obligations under the contract entered into with you (e.g. to deliver an event or service to you), or to take steps you ask us to prior to entering into a contract (e.g. to process your event registration and payment). We will use your personal information to supply you with tickets to an event and any associated products and services,

to contact you with any information relating to the event or your purchases, to deliver the event and your purchases to you in accordance with any requests you make and that we agree to, and to respond to any questions, comments or complaints you have in relation to the event, service or other purchases you make from us.

- **For legal reasons:** We may also use your personal data for our legitimate interests, including dealing with any customer services you require, enforcing the terms of any other agreement between us, for regulatory and legal purposes (for example anti-money laundering), for audit purposes and to contact you about changes to this policy.

Who do we share your data with?

We may share your personal data with any service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including our event leaders, payment providers, event ticketing providers, email communication providers, IT service providers, accountants, auditors and lawyers.

Under certain circumstances we may have to disclose your personal data under applicable laws and/or regulations, for example, as part of anti-money laundering processes or protect a third party's rights, property, or safety.

We may also share your personal data in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

Other than this, we will not share your information with other organisations without your consent.

Where we hold and process your personal data

Some or all of your personal data may be stored or transferred outside of the UK and the European Union (the EU) for any reason, including for example, if our email server is located in a country outside the UK or EU or if any of our service providers or their servers are based outside of the UK or EU. We shall only transfer your personal data to organisations that have provided adequate safeguards in respect of your personal data.

How we keep your information safe

We understand the importance of keeping your personal information safe, and we take appropriate steps to safeguard it.

We appreciate that if you participate in an event or course with us, you may need to disclose sensitive personal information to us, e.g. medical records. To prevent the complexity inherent in a two-tier system, e.g. where some data is held on separate servers, we therefore operate to a high standard of security across the board.

The measures we take include:

- **Encryption to keep your data safe while it is in transit:** When you do things like send us an email, fill in an enquiry form or fill in a course application form, the data that you enter moves between your device and our software and/or server environment. We protect this data using encryption

technology like HTTPS, Transport Layer Security and Secure FTP. This also applies when we share your data with third parties, as discussed in the next section. Any payment transactions are encrypted using SSL technology.

- **Encryption and password-protection to keep your data safe while it is stored with us:** Once you give us your data, it is stored in leading cloud-based environments, on servers, and in software running on our computers. These computers are password-protected. Where your data is stored in the cloud or on a server, our contracts with these service providers contain terms that confirm your data is managed in accordance with principles of GDPR. We carefully conduct due diligence on all of our vendors.
- **Enforcement of strong password rules:** We use strong passwords and a password management environment to keep our online and cloud-based environments secure. We also enforce a strong-password rule on our students, by providing each student with a unique, randomly generated, strong password that they are not able to change. This prevents system users from using easily-guessed or easily hacked passwords.
- **Security reviews:** We carry out reviews of the technology platforms we use, and of the associated vendors, to ensure they are implementing the latest security measures on our behalf. When a vendor does not meet these requirements, we replace them. We also perform penetration testing on servers that host our online learning environment.
- **Regular infrastructure updates:** We keep our IT infrastructure up to date to ensure that security measures keep up with evolving threats. This includes upgrades to our online learning environment and the server it is hosted on, and updates to operating systems and software packages. Because much of our infrastructure is provided by leading cloud-based providers, many of these upgrades and updates are automated, reducing the scope for human error or forgetfulness.

We ensure that only authorised persons have access to your information, and that everyone who has access is appropriately trained to manage your information. This means that only our employees and contractors have access to your information, except as noted in the next section.

Where we have given, or you have chosen a password, you are responsible for keeping this password confidential.

However, you acknowledge that no system can be completely secure. Therefore, although we take these steps to secure your personal data, we do not promise that your personal data will always remain completely secure. We will notify you if we suffer from a security breach.

Moreover, no data transmission over the internet can be guaranteed to be completely secure. So whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online, and you do this at your own risk. This applies particularly to email transmissions: although we apply encryption at our end, if your email service does not support encryption, you may inadvertently send or receive unencrypted data.

How long we keep your information for

If you register with us, we shall retain your personal data until you close your account.

If you opt to receive marketing communications from us, we shall retain your personal data until you opt out of receiving such communications. We may periodically ask you to renew your consent.

If you have otherwise booked a ticket or associated products and services with us or contacted us with a question or comment, we shall retain your personal data for 6 months following such contact to respond to any further queries you might have.

If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

If you ask us to delete data related to your activities with us, such as photos of you and attendance records, we will do so. However, we will keep a record of your contact details and of limited information needed to uniquely identify you as a participant and/or graduate (in the case of CDP courses).

Keeping your information up to date

Please let us know if your contact details change. You can do so by contacting us hello@guidedbynature.cymru.

Use of aggregated data

Where data can be aggregated and anonymised, we may use this for research purposes without restriction. For example, we may monitor customer traffic patterns, website and Services usage and related information in order to optimise users' usage of the Site and Services and we may give aggregated statistics to a reputable third-party. We are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

Cookies

A cookie is a small text file containing a unique identification number that is transferred (through your browser) from a website to the hard drive of your computer. The cookie identifies your browser but will not let a website know your name and/or address. These files are then used by websites to identify when users revisit that website.

Our event ticket shop uses cookies so that we can recognise you when you return and personalise your settings and preferences. Most browsers are initially set up to accept cookies. You can change your browser settings either to notify you when you have received a cookie, or to refuse to accept cookies. Please note that our event ticket shop may not operate efficiently if you refuse to accept cookies.

We also use Google Analytics to monitor how the event ticket shop is used. Google Analytics collects information anonymously and generates reports detailing information such as the number of visits to the event ticket shop, where visitors generally came from, how long they stayed on the event ticket shop, and which pages they visited. Google Analytics places several persistent cookies on your computer's hard drive. If you do not agree to this you can disable persistent cookies in your browser. This will prevent Google Analytics from logging your visits.

Opting out of cookies

If you do not wish to receive cookies from us or any other website, you should be able to turn cookies off on your web browser. Please follow your browser provider's instruction in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies, nor for any resulting malfunction of our websites.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit aboutcookies.org or allaboutcookies.org.

Your rights

You have the right to obtain from us a copy of the personal data that we hold for you, and to require us to correct errors in the personal data if it is inaccurate or incomplete. You also have the right at any time to require that we delete your personal data. To exercise these rights, or any other rights you may have under applicable laws, please contact us at hello@guidedbynature.cymru.

Please note that we reserve the right to charge an administrative fee if your request is manifestly unfounded or excessive.

If you have any complaints in relation to this policy or otherwise in relation to our processing of your personal data, you should contact the UK supervisory authority: the Information Commissioner, see www.ico.org.uk.

Our event ticket shop may contain links to other sites of interest. Once you have used these links to leave our event ticket shop, you should note that we do not have any control over that other site. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this policy. You should exercise caution and look at the privacy policy applicable to the site in question.

Research with our customers

We always aim to improve the services we offer. As a result, we occasionally contact our customers for research purposes. Participation in research is voluntary, and you are under no obligation to reply to any research request that you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all of our other customer information.

Changes to this Policy

This Policy may be changed from time to time. If we make any significant changes, we will advertise this on our website or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.

General

If any provision of this policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect.

This policy shall be governed by and construed in accordance with the law of England and Wales, and you agree to submit to the exclusive jurisdiction of the Welsh Courts.

We may change the terms of this policy from time to time. You are responsible for regularly reviewing this policy so that you are aware of any changes to it. If you continue to use our event ticket shop after the time we state the changes will take effect, you will have accepted the changes.

Questions?

Please contact us at hello@guidedbynature.cymru or call Caroline at 07890 992576.