

## **DATA PRIVACY**

# **POLICY**

Skydive Jersey Ltd PO Box 88, JE4 9PF Mobile 07797813944

Last Reviewed: 30th January 2025

Next Review: Annually

Registered with the JOIC #70147



## **Data Protection Policy**

#### Introduction

This Data Protection Policy outlines Skydive Jersey's commitment to ensuring the security and confidentiality of the personal data we collect and process. It is designed to inform staff, customers, and stakeholders about our data protection practices and ensure compliance with relevant data protection regulations.

#### Scope

This policy applies to all employees, contractors, and third-party service providers who handle personal data on behalf of Skydive Jersey. It covers all personal data, regardless of form, that is collected, stored, transmitted, or processed by the company.

#### **Definitions**

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- Data Subject: The individual whose personal data is being processed.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes personal data on behalf of the data controller.

## **Company Registration**

**Skydive Jersey Ltd** is registered with the Office of the Information Commissioner (Jersey) (**JOIC**), in accordance with the requirements of the current legislation.

https://jerseyoic.org/for-individuals https://jerseyoic.org/search-the-registry/

### **Principles**

We adhere to the following principles when processing personal data:

- Lawfulness, Fairness, and Transparency: Personal data must be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal data must be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Accuracy: Personal data must be accurate and kept up to date.
- Storage Limitation: Personal data must be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which it is processed.
- Integrity and Confidentiality: Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

#### **Data Collection**

We collect personal data only for specified, explicit, and legitimate purposes. The data subject must be informed about:

- The identity and contact details of the data controller.
- The purposes of the processing for which the personal data is intended.
- The legal basis of processing.
- Any third parties with whom the data will be shared.
- The period for which the data will be stored.

### **Data Processing**

Personal data shall only be processed in accordance with the data subject's consent or under other lawful bases to achieve our mission, and deliver skydiving services with directly associated products such as:

- To administer and provide services you request or have expressed an interest in
- To communicate with you if any of our services you have requested are unavailable
- To manage your account and sort out payment
- To trace and recover any debts incurred
- To ensure we can contact you (or a relevant family/friend) in the event of an emergency occurred during participation of our services
- To be compliant with health and safety procedures, particularly in the event of an accident
- To personalise and tailor any communications that we may send you
- To enable us to administer any competitions or other offers For profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us For promotional and marketing materials and activities, including photos and videos
- To look into any complaints or questions you may raise Aid strategic development
  Other purposes reasonably ancillary to the above.

#### **Data Collection**

We collect your personal data in a number of ways including:

- When you register for information via our website
- A paper copy application form when you book on a course or registered electronically via our Online booking system.
- Your interaction with our staff both in person and on the telephone
- When you email us
- Information we collect from our contact on social media (including but not limited to Twitter and Instagram)

## **Data Rights**

Data subjects have the following rights regarding their personal data:

- **Right to Access:** The right to obtain confirmation as to whether personal data concerning them is being processed and access to that data.
- Right to Rectification: The right to have inaccurate personal data corrected.
- Right to Erasure: The right to have personal data erased under certain conditions.
- **Right to Restrict Processing:** The right to restrict the processing of personal data under certain conditions.
- Right to Data Portability: The right to receive personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to Object:** The right to object to the processing of personal data under certain conditions.

If you have a complaint regarding any aspect of your personal data or this privacy policy, please write to us at the above address. If you are still not satisfied with the outcome of your complaint, you may write to the Jersey Office of the Information Commissioner at the following address: Jersey Office of the Information Commissioner, 2nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT Email: enquiries@jerseyoic.org Telephone: +44 (0)1534 716530

## **Data Security**

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- Encryption of personal data.
- Ensuring confidentiality, integrity, and availability of processing systems and services.

 Regular testing, assessment, and evaluation of the effectiveness of technical and organisational measures for ensuring security.

## How long do we keep your personal data?

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

**RETENTION** of data on a Legal basis for processing Administration and delivery of courses and services, up to 5 years.

**MARKETING** of our services including newsletters, mailing lists, competitions and imagery, indefinitely.

## **Data Breach Management**

In the event of a data breach, we will:

- Notify the relevant supervisory authority within 72 hours of becoming aware of the breach.
- Communicate the nature and consequences of the breach to the affected data subjects if the breach is likely to result in a high risk to their rights and freedoms.

## **Third-Party Data Processors**

We may share your data with third parties (a) if we are under a legal or regulatory duty to do so, (b) if it is necessary to do so to enforce our terms of use, terms and conditions of sale or other contractual rights, (c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity, (d) where such disclosure is necessary to protect the safety or security of any persons, and/or (e) otherwise as permitted under applicable law.

When using third-party data processors, we will:

 Only engage processors providing sufficient guarantees to implement appropriate technical and organisational measures. • Enter into data processing agreements that define the processing to be carried out and that include appropriate data protection clauses.

We may also share your personal data in order to effectively deliver our services. This might be because another agency has been contracted to provide a service, or because responsibility for particular services is shared across multiple agencies or authorities, such as health and social care. Your personal information will not be transferred outside of the EU.

## **Training and Awareness**

We ensure that all employees handling personal data are informed and trained on data protection principles and procedures.

#### **Review and Amendments**

This policy will be reviewed and updated periodically to ensure continued compliance with applicable laws and regulations. Any amendments will be communicated to employees and relevant stakeholders.

#### How to contact us

If you have any questions about this privacy policy or about your personal data, please write to us at: Data Protection Officer, Skydive Jersey Ltd, PO Box 88, Jersey, JE4 9PF.