Making a Difference Adventures Community Interest Company Privacy/ UK GDPR Policy

Document History	
Adopted	November 2022
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Introduction

In order to operate MAD Adventures business efficiently, we may collect information about people with whom we work. These may include, volunteers, customers, potential customers, current, past, and prospective employees, volunteers, suppliers, and prospective suppliers. The United Kingdom General Data Protection Regulation (GDPR) regulates the way that MAD Adventures handles 'personal data' that we may collect whilst carrying out our functions and gives certain rights to people whose 'personal data' we may hold.

We consider that the correct treatment of personal data is integral to our successful operations and to maintaining the trust of the persons we deal with. We fully appreciate the underlying principles of the UK GDPR and support and adhere to its provisions.

Information covered by the UK GDPR

The UK GDPR uses the term 'personal data'. For information held by MAD Adventures CIC, personal data essentially means any recorded information held by us and from which a living individual can be identified. It will include a variety of information including names, addresses, telephone numbers, photographs of people, and other personal details.

Data protection principles

We will comply with the eight enforceable data protection principles by making sure that personal data is:

1. Fairly and lawfully processed.
2. Processed for limited purposes.
3. Adequate, relevant, and not excessive.
4. Accurate and kept up to date.
5. Not kept longer than necessary.
6. Processed in accordance with the individual's rights.
7. Secure.
8. Not transferred to others without the knowledge and consent of the individual.

Conditions

We will ensure that at least one of the following conditions is met before we process any personal data:

- The individual has consented to the processing.
- The processing is necessary for the performance of a contract with the individual.
- The processing is required under a legal obligation (other than one imposed by a contract).
- The processing is necessary to protect the vital interests of the individual.
- The processing is necessary to carry out public functions e.g. administration of justice.
- The processing is necessary to pursue our legitimate interests or those of third parties (unless it could unjustifiably prejudice the interests of the individual).

Under the Act, one of a set of additional conditions must be met for 'sensitive personal data'. This includes information about racial or ethnic origin, political opinions, religious and other beliefs, trade union membership, physical or mental health conditions, sex life, criminal proceedings, or convictions. We will ensure that one of the following additional conditions are met before we process any sensitive personal data:

- The individual has explicitly consented to the processing.
- We are required by law to process the information for employment purposes.
- We need to process the information in order to protect the vital interests of the individual or another person.
- The processing is necessary to deal with the administration of justice or legal proceedings.

Individuals' Rights

We will ensure that individuals are given their rights under the Act including:

- the right to obtain their personal information from us except in limited circumstances
- the right to ask us not to process personal data where it causes substantial unwarranted damage to them or anyone else
- the right to claim compensation from us for damage and distress caused by any breach of the Act

Legal Requirements

While it is unlikely, MAD Adventures may be required to disclose data by a court order or to comply with other legal requirements. We will use all reasonable endeavours to notify those concerned before we do so unless we are legally restricted from doing so.

No Commercial Disposal to Third Parties

MAD Adventures CIC shall not sell, rent, distribute or otherwise make user data commercially available to any third party, except as described above or with prior permission.

Our commitment to data protection

We will ensure that:

- Everyone managing and handling personal information understands that they are responsible for following good data protection practice.
- There is someone with specific responsibility for data protection in the organisation.
- Staff who handle personal information are appropriately supervised and trained.
- Queries about handling personal information are promptly and courteously dealt with.
- People know how to access their own personal information.
- Methods of handling personal information are regularly assessed and evaluated.
- Any disclosure of personal data will be in compliance with approved procedures.
- We will take all necessary steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure

- All contractors who are users of personal information supplied by MAD Adventures CIC will be required to confirm that they will abide by the requirements of the Act concerning information supplied by us.

We have appointed a head of information compliance to lead on data protection for MAD Adventures CIC. This person is responsible for ensuring that the policy is effectively implemented. The nominated person is Mr Roger Davies.

Approved By:

Name:	ED SHAW
Company Position:	C.E.O
Date:	29th JANUARY 2026
Signature:	