

NORFOLK SUPERHERO PRIVACY POLICY & COOKIE POLICY 16 OCTOBER 2021

Background

This Privacy Policy sets out the data processing practices carried out through the use of the internet and any other electronic communications networks by Norfolk Superhero Challenge Limited (company number 13634853) of Registered address: 1 Bale Hall Barn, Field Dalling Road, Bale, Norfolk, NR21 0QS ("NSCL"). NSCL is the controller and responsible for your personal data (referred to as "NSCL", "we", "us" or "our" in this privacy notice).

NSCL understands that your privacy is important to you and that you care about how your personal data is used. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. We may change this policy from time to time by updating this page.

1. Information About Us

Our Site is owned and operated by Norfolk Superhero Challenge Limited, a Limited Company in England under company number 13634853. Registered address: 1 Bale Hall Barn, Field Dalling Road, Bale, Norfolk, NR21 0QS.

2. What Does This Policy Cover?

This Privacy Policy applies to your use of our Site, Entry Form, Waiting List forms and other electronic communications networks. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

1. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 14.
2. The right to access the personal data we hold about you. Part 12 will tell you how to do this.
3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 14 to find out more.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 14 to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.

7. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
8. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 14.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office the UK supervisory authority for data protection issues (www.ico.org.uk). We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 14.

5. What Data Do You Collect? How Do You Collect My Personal Data? How do you Use My Personal Data?

Depending upon your use of our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 13 for more information about our use of Cookies and similar technologies and our Cookie Policy. We do not collect any 'special category' or 'sensitive' personal data or data relating to criminal convictions and/or offences.

What data do we collect?

1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
2. We collect personal information from visitors to this Site and people who sign up to our events which we have grouped together as follows:
 - i. "Identity Data" such as first name, last name and date of birth, photographs, bib /race number, age, gender and insurance details.
 - ii. "Contact Data" includes residential address, delivery/billing address, email address, social media handles and telephone numbers.
 - iii. "Transaction Data" includes details about payments to and from you and other details of products and services you have purchased from us.
 - iv. "Technical Data" such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
 - v. "Profile Data" includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, performance, results and times at our events, products you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, mouse-overs and methods used to browse away from the page).
 - vi. "Usage Data" includes information about how you use the Site, products and services.
 - vii. "Marketing and Communications Data" includes your preferences in receiving marketing from us and our third parties and your communication preferences.
 - viii. We also collect, use and share "Aggregated Data" such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the

percentage of users accessing a specific Site feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

- ix. We may also collect personal data that includes “Sensitive” or “Special Categories” of personal data (also known as “Special Category Data”), such as: information about your health, and certain medical and health information and where required to ensure a safe environment and adherence to government instructions and guidelines.

How do we collect your data?

We use different methods to collect data from and about you including through:

- i. Direct interactions. You may give us your Identity, Contact, and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - sign up to one of our events;
 - sign up to our waiting list;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- ii. Indirect Interactions. From someone else acting on your behalf, for example when an entrant to one of our events puts you down as an emergency contact detail or if a parent or guardian has purchased an entry place for you at one of our events.
- iii. Automated technologies or interactions. As you interact with our website(s), we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see the section on cookies below.

How do we use your personal data?

We process personal information collected for the purposes of:

- i. providing and personalising our services;
- ii. dealing with your enquiries and requests;
- iii. maintaining information as a reference tool or general resource;
- iv. carrying out market research campaigns; and
- v. providing you with information about products and services.

We may use your data to send you information regarding our products or services. You may withdraw your consent to receive these marketing materials at any time by unsubscribing from communications sent to you by us.

We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

We may also include your data in event participation lists and event result lists which may be circulated to all participations before and after an event and which may also be made publicly available. You may withdraw your consent to your data being included on these lists at any time by emailing us at nick@norfolksuperhero.co.uk.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 14.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

We have set out below, all the ways we use your personal data, and the legal bases on which we rely to do so:

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a Contract with you
To apply to participate, or participate, or to organise a team, in any of our events	(a) Identity Data (b) Contact Data (c) Transaction Data (d) Technical Data (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a Contract with you (b) Legitimate Interests (we need this data to be able to allow you to participate in our events and to stage our events).
To facilitate and publish the results of our events	(a) Identity Data (b) Profile Data	(a) Performance of a Contract with you (b) Legitimate Interests (we need the ability to publish and store the results and keep a historic log of this data all for the purpose of staging the event(s) and for archival and historic research.)
To invite you to participate, and for you to participate, in our hospitality	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Performance of a Contract with you. (b) Legitimate Interests (we need this data to be able to give you the option to attend, and to provide you with, hospitality).
To volunteer for our events	(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a Contract with you (b) Legitimate Interests (we need this data to be able to allow you to participate in our events and to stage our events). (c) Necessary to Comply with a Legal or Regulatory Obligation (including security and safety at our events and tax purposes).
To be a partner, sponsor or supplier or potential partner, sponsor or supplier of or to us or our events	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (as our partner, sponsor or supplier)

	(e) Marketing and Communications Data	(b) Legitimate Interests (we need this data to be able to contact you about becoming a partner, sponsor or supplier to allow you to become officially associated with us or our event(s)). (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax purposes).
To be a medical professional at one of our events	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Performance of a Contract with you (b) Legitimate Interests (we need this data to be able to allow you to provide your services at our events, to ensure that you are adequately qualified and to ensure that we have the requisite number of medical professionals at our events). (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax and insurance purposes).
To be a Golden Ticket Holder or other charity contact	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Legitimate Interests (we need this data to be able to provide you with the benefits of being a bond holder or charity contact and to ensure that you remain on the waiting list if you are on such list).
To attend one of our events in any capacity that requires photographic accreditation (not otherwise dealt with in this table)	(a) Identity Data (b) Contact Data	(a) Legal Obligation (b) Performance of a Contract with you (c) Legitimate Interests (we need this for security reasons).
To register you as a new customer (not otherwise dealt with in this table)	(a) Identity Data (b) Contact Data	(a) Performance of a Contract with you (b) Legitimate Interests (to provide you with customer services).
To process and deliver your order including: (a) Manage payments, fees and charges; and (b) Collect and recover money owed to us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to recover debts due to Us) (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax and consumer protection purposes).
To manage our relationship with you which will include:	(a) Identity Data (b) Contact Data (c) Profile Data	(a) Performance of a Contract with you (b) Necessary to Comply with a Legal or Regulatory Obligation

<p>(a) Notifying you about changes to our Terms and Conditions or Privacy Policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) dealing with any complaints and responding to feedback</p>	<p>(d) Marketing and Communications Data</p>	<p>(c) Necessary for our Legitimate Interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</p> <p>(d) Usage Data</p> <p>(e) Marketing and Communications Data</p>	<p>(a) Performance of a Contract with you</p> <p>(b) Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Technical Data</p>	<p>(a) Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to Comply with a Legal or Regulatory Obligation</p>
<p>To deliver relevant marketing materials to you (in the form of our newsletter) and to measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</p> <p>(d) Usage Data</p> <p>(e) Marketing and Communications Data</p> <p>(f) Technical Data</p>	<p>(a) Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p> <p>(b) Consent (you will only receive our newsletter where you have separately consented to doing so. You may remove your consent at any time)</p>
<p>To use data analytics to improve the Site and our products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical Data</p> <p>(b) Usage Data</p>	<p>(a) Necessary for our Legitimate Interests (to define types of customers for our products and services, to keep the Site updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you (including where your image is captured by our official photographer at one of our events)</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Technical Data</p> <p>(d) Usage Data</p> <p>(e) Profile Data</p>	<p>(a) Necessary for our Legitimate Interests (to develop our products/services and grow our business and to provide you with the opportunity to purchase goods that commemorate your participation in one of our events (such as an official photograph))</p>
<p>For event logistics and operational purposes (including emergency service access routes,</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p>	<p>(a) Necessary for our Legitimate Interests (for ensuring that the event logistics are in place and safety and security is maintained</p>

personal care plans, safety and security and public access routes)		to ensure successful staging of our events) (b) Necessary to Comply with a Legal or Regulatory Obligation (safety and security and insurance)
To enable you to access and/or remain at our premises or events or ensuring the safety of You and others with the aim of: (a) creating a safe environment (including observing protocols around limiting the number of visitors and staff within our spaces, and other measures which have the aim of keeping people safe; (b) adhering to the most up-to-date government instructions and guidelines; and (c) maintaining and monitoring facilities for health and safety purposes	(a) Identity Data (b) Contact Data (c) Sensitive Data	(a) Necessary to Comply with a Legal or Regulatory Obligation (b) Necessary for our Legitimate Interests (to keep our records updated and to keep people and premises safe)
To allow us to become affiliated to selected membership organisations (such as British Quadrathlon Association)	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (membership rules and regulations). (b) Legitimate Interests (we need this data to be able to utilise the membership benefits).

Where we process special categories of data other legal bases for processing may apply including, for example for the provision of medical care and treatment.

6. How Long Will You Keep My Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

7. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will only transfer personal data to countries that are deemed to provide an adequate level of protection for personal data or you have consented to us sharing your personal data with a company based outside the UK through our Protected Until Connected. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office the UK supervisory authority for data protection issues (www.ico.org.uk). Please contact us using the details below in Part 14 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

8. Do You Share My Personal Data?

We may share your data with:

- i. Professional Advisers;
- ii. Regulatory Authorities;
- iii. Our contractors and suppliers, where they process personal data on our behalf; and
- iv. Our partners, but only where you have consented.

We will not share any of your personal data with any other third parties for any purposes, unless you have agreed to your personal data being shared by us.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. How Can I Control My Personal Data?

- In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing and at the point of providing your details).
- You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Marketing

Future Events. We will ask for your specific consent regarding your preferences around whether you would like to receive information around our future events. You can withdraw your consent to receive information at any time by emailing NSHL.

Specific Event Information. Where you sign up to one of our events we will ask you whether you would like to receive event specific information to maximise your event experience. These communications may include relevant materials from our partners, however we will not pass on your personal information to these partners. You can withdraw your consent to receive information at any time by emailing NSHL.

Third-Party Marketing. We will always get your express opt-in consent before we share your personal data with any company for marketing purposes. We will specifically mention the companies with whom we may share your personal data with at the point of asking for your consent

11. Can I Withhold Information?

You may access certain areas of our Site without providing any personal data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 13 and our Cookie Policy.

12. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. How Do You Use Cookies?

A cookie is a small file which asks permission to be placed on your computer’s hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use Google Analytics cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Google Analytics is used by millions of websites the world over and these anonymised cookies help us see how people use our site, including where people find out about us, which pages they visit and how long they spend on the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites visit tools.google.com/dlpage/gaoptout

14. How Do I Contact You?

To contact us about anything to do with your personal data and data protection – including to make a subject access request, requesting for your data to be deleted or removing the link to social media platforms please email nick@norfolksuperhero.co.uk

15. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on 16th October 2021.