

Welcome to Impulse Alpine Ltd's privacy notice.

Impulse, Alpine Ltd, ("we", "us" or "our") respects your privacy and we are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. WHO WE ARE AND IMPORTANT INFORMATION

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website and booking system, including any data you may provide through this website. It also covers personal data provided to us via phone, email or other means.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Controller – who we are

The data controller of our site is Impulse Alpine Ltd Ltd, 5 Ducketts Wharf, South Street, Bishops Stortford CM233AR. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us via email to dataprotection@impulse-racing.co.uk

In this policy, references to 'we', 'us' and 'our' means Impulse Alpine Ltd. Impulse Racing operates a network of schools ski training and race events across the UK and the alps.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25th May 2018. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name and last name.
- Contact Data includes email address and telephone numbers.
- Technical/Website Usage Data includes internet protocol (IP) address 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.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences (specifically if manually unsubscribing to certain types of communication).

Professional Data includes any information we may collect in the course of providing our services to you. This includes bank and payment card details, transactional data such as details of payments to and from Impulse Alpine Ltd, delivery address and project contacts.

We also collect and use Aggregated Data such as statistical or demographic data for internal purposes.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with an answer to an enquiry). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

Direct interactions. You may give us your Identity, Contact and Professional Data by filling in contact forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you submit an enquiry, purchase online or when you enter one of our online competitions.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy (under Section 4) for further details.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need it to deliver products and services in the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally, we rely on legitimate interest as a legal basis for processing your personal data and marketing to you. You have the right to unsubscribe to marketing at any time by contacting us.

Purposes for which we will use your personal data

Below is a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purposes for which we will use your personal data

To respond to your enquiry submitted on the site or via phone or email

(a) Identity

(b) Contact

(c) Professional

Necessary for our legitimate interests (to offer our services to you)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(a) Identity

(b) Contact

(c) Technical

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)

Necessary to comply with a legal obligation

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

(a) Technical

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about services that may be of interest to you

(a) Identity

(b) Contact

(c) Technical

(d) Marketing & Communications

(e) Professional

Necessary for our legitimate interests (to develop our products/services and grow our business)

To provide our products and services to you

(a) Professional

- Performance of a contract with you

(a) Contact

- Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with information about products and services that might be relevant to you based on your prior purchase history.

We may use your Identity, Contact, Technical data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us (under the lawful basis of legitimate interest) unless you have unsubscribed, requesting not to receive that marketing. You can ask us or franchisees to stop sending you marketing messages at any time by [contacting us](#) at any time, after which we will cease sending marketing communications to you.

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 the following cookies:

- Essential cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to navigate our website, and use its features. When you return to the site, they enable us to remember the products that you've looked at.
- Personalisation cookies. These allow us to recognise and count the number of visitors to our website, and see how they use it. This helps us to learn where we can improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We will track the volume of people on our site, where they click and where they exit the site.
- Remarketing cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed to you more relevant to your interests. We may also share this information with third party service providers so that we can show adverts that are relevant to you elsewhere on the internet.

By continuing to browse our website, you provide consent to us storing these cookies on your device and using them if you visit our site again. You can delete cookies at any time in your device browser. The method of deletion will vary so please check the help section on your device browser for more information. If you delete or block cookies it may affect the way our website works for you.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties in the event that of a sale, transfer, or merger of our business, parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. The Impulse Racing website and associated databases are protected by certified firewalls in order to protect your personal information from access by unauthorised persons and against unlawful processing. The database uses the latest technology with full back-ups. All personal information is kept confidential and is password protected and outgoing and incoming emails are screened for viruses.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. If you think that any part of our process is not secure or believe there has been a breach, please email us at dataprotection@impulse-racing.co.uk

7. DATA RETENTION - HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.

- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to unsubscribe to marketing material.

If you wish to exercise any of the rights set out above, please contact us.

There will be no fee to pay to access or amend any personal data we hold about you. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GDPR STATEMENT

The General Data Protection Regulation (“GDPR”) aims to set a new standard for how companies use and protect individuals’ data. Here at Impulse Racing, we take how we use and hold your personal data very seriously and we view the GDPR as an opportunity to enhance our commitment to data protection for your benefit. We’ve been updating our organisational processes, updating our policies, updating our client engagement letters and marketing processes to prepare for the GDPR to ensure that we are compliant.

11. GLOSSARY

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties

External Third Parties

- Our coaches who will only use the information to provide services requested.
- Agencies and suppliers retained to assist us to more effectively fulfil training, manage and conduct promotions and offers or provide assistance and support.

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This

enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.