

XKEYS LTD PRIVACY POLICY

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1. Who are we?

XKeys Ltd is the company which runs XUK Activity, XUK English, XUK Excel and Mini Minors & XUK Day. XKeys Ltd is therefore the 'data controller' of information collated for the successful operation of our holiday camps. As such XKeys Ltd has a duty to abide by data protection law including both the [General Data Protection Regulation \(EU 2016/679\)](#) and the [UK Data Protection Act 2018](#).

2. What is the purpose of this policy?

This policy is intended to provide information about how XKeys Ltd will use (or 'process') personal data about individuals including: its staff; its current, past and prospective campers; and their parents, carers or guardians (referred to in this policy as 'parents').

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and campers are all encouraged to read this Privacy Notice and understand XKeys Ltd's obligations.

This policy applies in addition to XKeys Ltd's other relevant terms and conditions and policies. Anyone who works for, or acts on behalf of, XKeys Ltd (including staff, schools, agents and service providers) should also be aware of and comply more broadly with this policy and our [Policies and Procedures](#).

3. We have appointed someone to get it right

XKeys Ltd has appointed a Privacy and Compliance Officer. They will deal with all requests and enquiries concerning XKeys' Ltd use of personal data and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

4. Why do we need to process your data?

In order to carry out its ordinary duties to staff, campers and parents, XKeys Ltd needs to process a wide range of personal data about individuals as part of its daily operations.

Some of this activity XKeys Ltd will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its campers.

The table below shows XKeys Ltd's uses of personal data in accordance with the legal bases as outlined in the [GDPR](#):

Our Uses	Applicable Legal Bases				Special category personal data
	Performance of a contract	Compliance with other legal obligations	Vital interests of the data subject	Legitimate interests	Article 9[2] Conditions
Enrolment and employment (confirm identity of campers, parents and staff).	✓	✓			
Carry out DBS checks.		✓			✓ (condition b)
Safeguard individuals' welfare and provide appropriate care.		✓	✓		
Health and dietary records.		✓	✓		✓ (condition h)
Security and emergency purposes.		✓	✓		
Carry out or cooperate with any complaints, disciplinary or investigation process.		✓			
Enable relevant authorities to monitor XKeys Ltd's performance and to intervene or assist with incidents as appropriate.		✓	✓		
Provide information about our products and services.				✓	
Make use of photographic images of individuals in publications, the website and (where appropriate) on social media channels in accordance with company Policies .*				✓	
Where otherwise reasonably necessary for XKeys Ltd's purposes, including to obtain appropriate professional advice and insurance for the business.		✓		✓	

*Images of Individuals

XKeys Ltd processes images in the main to support international families, provide uplifting moments for children and parents, record daily activities and promote XUK camps.

It is in the interests of the majority of families attending XUK Camps to process images in this way. As a result, we have concluded that this data can be categorised under legitimate interests. To do otherwise would be detrimental to the well-being of families and the business itself.

If a family does not wish images to be processed, then they should contact XKeys Ltd to discuss whether any photographs can be taken or if camp is a suitable environment for their child.

5. What data do we actually process?

This will include by way of example:

- Contact details and personal information;
- Bank details and other financial information;
- Operational and professional information;
- Images of individuals (in accordance with XKeys Ltd's [Policies and Procedures](#)).

6. How do we collect data?

XKeys Ltd receives the majority of personal data from the individual directly (including, in the case of campers, from their parents). In very few cases personal data is supplied from nominated agents with a relationship with individuals, whom have given consent to act on their behalf.

7. Who has access to personal data & with whom do we share it?

Occasionally, XKeys Ltd will need to share personal information with third parties, such as:

- **Professional advisers** (e.g. lawyers, insurers, and accountants);
- **Government authorities** (e.g. HMRC, police or the local authority); and
- **Appropriate regulatory bodies** [e.g. Ofsted, BAC, ICO].

In accordance with Data Protection Law, some of XKeys Ltd's processing activity is carried out on its behalf by other third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with XKeys Ltd's specific directions.

We may collect your IP address and use cookies unless you configure your web browser not to accept them. At the time of writing the cookies used on the website are from LiveChat and Google Analytics.

We will only pass on information about an individual to third parties in accordance with the legal bases identified in Section 4 of this document.

8. For how long do we keep personal data?

XKeys Ltd will retain personal data securely as follows:

- Personal data that is processed for **'the performance of a contract,' 'compliance with other legal obligations'** and **'the vital interests of the data subject'** will be retained indefinitely (see Section 4).
- Personal data that is processed for **'legitimate interests'** (see Section 4) will usually be retained for no more than 3 years, unless there are lawful or necessary reasons to keep it for longer, which to do otherwise would have a detrimental impact on the business.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact our **Privacy and Compliance Officer**. However, please bear in mind that XKeys Ltd, as outlined above, will often have lawful and necessary reasons to hold on to some personal data **even following such request**.

9. Keeping in touch

XKeys Ltd will use the contact details of individuals to keep them updated about our products and services according to our '**legitimate interests**.' Individuals have a right not to receive these updates and can inform XKeys Ltd at any time of their wishes. XKeys Ltd will attempt to make this as straightforward as possible.

10. Your rights

i) Requests

Individuals have various rights to access and understand personal data about them held by XKeys Ltd. However, this is subject to certain exemptions and limitations. Individuals can exercise the following rights:

- To be informed about how it is used;
- To request access to it;
- To request that it is rectified;
- To request erasure if there is no compelling reason for its continued processing;
- To request that its processing is restricted;
- To data portability;
- To object to it being processed.

Any individual wishing to exercise their rights should put their request in writing to the XUK **Privacy and Compliance Officer**.

XKeys Ltd will endeavour to respond to any such reasonable written requests as soon as is sensibly practicable and in any event within one month. If the request for information is manifestly excessive or similar to previous requests, XKeys Ltd may ask you to reconsider.

All information requests from, on behalf of, or concerning campers will be considered on a case by case basis.

ii) Request exemptions

We will sometimes have reasons to refuse specific requests such as when it falls within the legal bases (see Section 4) identified in this Privacy Policy. All such requests will be considered on their own merits.

iii) Rights

The rights under Data Protection Law belong to the individual to whom the data relates. However, XKeys Ltd will often rely on parental authority or notice for the necessary ways it processes personal data relating to campers.

All individuals are required to respect the personal data and privacy of others, and to comply with our [Policies and Procedures](#).

11. Securing & maintaining data

XKeys Ltd will endeavour to ensure that all personal data held in relation to an individual is as up to date and as accurate as possible. Individuals must please notify XKeys Ltd of any significant changes to important information held about them.

XKeys Ltd takes appropriate technical and organisational steps to ensure the security of personal data about individuals. These include:

- **Database**
Strong passwords.
- **Network / Computers**
Strong passwords;
Firewall installed & kept up to date;
Antivirus installed & kept up to date.
- **Phones**
Strong passwords;
Short lock out period (if not being used).
- **Paper Documents**
Stored and locked up;
Alarmed building/s.
- **Education & Training**
Not to click on links unless they are a trusted source;
Not to open documents / attachments unless they are a trusted source;
Not to ignore warning boxes when surfing;
Always being aware someone is trying to catch your data;
Turning or logging off from computers and phones when not in use;
Minimising windows and applications open at one time.

Keeping information secure is very important to XKeys Ltd. Our website encrypts data using SSL. However, no data transmission over the Internet can be guaranteed to be totally secure. As a result, whilst we strive to protect your personal information, we cannot ensure or warrant the security of any information which you send to us, and you do so at your own risk.

12. Updates to the policy

XKeys Ltd will update this Privacy Policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

13. Questions & complaints

If an individual believes that XKeys Ltd has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should complete XKeys Ltd's [Complaint Form](#). You can also make a referral to or lodge a complaint with the [Information Commissioner's Office](#) (ICO), although the ICO recommends that steps are taken to resolve the matter with XKeys Ltd before involving the regulator.