

Privacy Policy

Last updated on 24th May 2018

Welcome to the privacy policy (the “Privacy Policy”) of:

The Ciderthon which is run by the following legal entity

- ENDURE IT LIMITED (company number 10667824) of Henley House, Swans Lane, Draycott, Somerset, BS27 3SS

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how Endure It looks after your personal data when you visit our websites at: www.ciderthon.com and tell you about your privacy rights and how the law protects you.

THE DATA WE COLLECT ABOUT YOU

- 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).
- We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
 - “Identity Data” includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, photographs, vehicle registration number(s), bib /race number, age, gender, qualifications, professional membership details and insurance details.
 - “Contact Data” includes billing address, residential address, delivery address, email address, social media handles and telephone numbers.
 - “Financial Data” includes bank account and payment card details.
 - “Transaction Data” includes details about payments to and from you and other details of products and services you have purchased from us.
 - “Technical Data” includes 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, full 'Uniform Resource Locators' clickstream to, through and from the Site (including date and time) and other technology on the devices you use to access the Site.
 - “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).

- “Usage Data” includes information about how you use the Site, products and services.
- “Marketing and Communications Data” includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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.

We may also collect personal data that includes “Sensitive” or “Special Categories” of personal data, such as: dietary requirements, details about your race or ethnicity, information about your health, genetic and biometric data and certain medical information (including whether or not you are a wheelchair user).

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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 Data, Contact Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on the Sites ticketing system;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - apply to participate in one of our Events;
 - volunteer in some capacity at one of our events;
 - enter a competition, promotion or survey;

- give us some feedback;
- **Automated technologies or interactions.** As you interact with the Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. we may also receive Technical Data about you if you visit other websites.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as analytics providers, advertising networks, technical, payment and delivery services, data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the EU. Please contact us to find out more about the various third parties and public sources from which we may receive personal data about you.

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 to perform 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.
- Please Contact us to find out more about the types of lawful basis that we will rely on to process your personal data.
- Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by Contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- We have set out below, in a table format, 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 and the period for which we retain your personal data. For the avoidance of doubt, please be aware that where we use a specific type of personal data for more than one reason and there is a conflict between the retention period for each such use in the table below, the longest retention period shall prevail.
- 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest	Retention period (not exceeding)
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).	5 years from last application to participate
To facilitate and publish the results of our events	(a) Identity Data (b) Profile Data	(a) Legitimate Interests (We need the ability to publish and store the results, rank individuals, challenge results after the Specific Event and keep a historic log of this data all for the purpose of staging the event(s) and for archival and historic research.).	In perpetuity

<p>To televise, film and/or otherwise record our events and to take photographs and record footage of our events</p>	<p>(a) Identity Data</p>	<p>(a) Legitimate Interests (We need the ability to publish, display, sell and distribute our events by means of film, television, radio, print media, internet, publicity material or any other media now or in the future).</p>	<p>In perpetuity</p>
<p>To invite you to participate, and for you to participate, in our Hospitality</p>	<p>(a) Identity Data (b) Contact Data (c) Marketing and Communications Data</p>	<p>(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, high-quality hospitality).</p>	<p>3 years since the last invitation or purchase, whichever is later</p>
<p>To volunteer for our events</p>	<p>(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data</p>	<p>(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).</p>	<p>3 years since your last application to volunteer</p>

<p>To provide your services on a casual labour basis to us</p>	<p>(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Profile Data (f) Marketing and Communications Data</p>	<p>(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).</p>	<p>7 years since you applied for your last role</p>
<p>To be included on our media lists</p>	<p>(a) Identity Data (b) Contact Data (c) Marketing and Communications Data</p>	<p>(a) Legitimate Interests (We need this data to be able to enable our events to be covered in the media).</p>	<p>3 years</p>
<p>To be a partner, sponsor or supplier or potential partner, sponsor or supplier of or to us or our events</p>	<p>(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data</p>	<p>(a) Performance of a Contract with you (as our partner, sponsor or supplier) (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</p>	<p>6 years after the end of any contract (if any) or 6 years from the last correspondence about being a potential partner, sponsor or supplier</p>

		Regulatory Obligation (including for tax purposes).	
To be a medical professional including doctor, podiatrist and physiotherapist 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).	6 years from the date of the last event you assisted with
To attend one of our events in any capacity that requires photographic accreditation (not	(a) Identity Data (b) Contact Data	(a) Legal Obligation (b) Performance of a Contract with you	6 years after the last time you were accredited

otherwise dealt with in this table)		(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).	3 years from last registration as a customer or last interaction with us as a customer, whichever is later
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).	6 years from order completion

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms 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>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</p> <p>(d) Marketing and Communications Data</p>	<p>(a) Performance of a Contract with you</p> <p>(b) Necessary to Comply with a Legal or Regulatory Obligation</p> <p>(c) Necessary for our Legitimate Interests (to keep our records updated and to study how customers use our products/services)</p>	<p>6 years from last correspondence</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>3 years from prize draw, competition or survey</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)</p>	<p>3 years from collection of data</p>

		<p>or group restructuring exercise)</p> <p>(b) Necessary to Comply with a Legal or Regulatory Obligation</p>	
<p>To deliver relevant Site content and advertisements to you and 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>3 years from collection of data</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>3 years from collection of data</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 (b) Contact Data (c) Technical Data (d) Usage Data (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>3 years from last unsuccessful ballot application or 3 years from last participation in one of our events, whichever is later</p>
<p>For event logistics and operational purposes (including emergency service access routes, personal care plans and public access routes)</p>	<p>(a) Identity Data (b) Contact Data</p>	<p>(a) Necessary for our Legitimate Interests (for ensuring that the event logistics are in place to ensure successful staging of our events) (b) Necessary to Comply with a Legal or Regulatory Obligation (safety and security and insurance)</p>	<p>3 years from the event to which the data relates</p>

MARKETING

- We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

- We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile 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 products, services and offers may be relevant for you (We call this marketing).

- You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

- We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

OPTING OUT

- You can ask us or third parties to stop sending you marketing messages at any time by logging into the Site and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by Contacting us at any time.
- Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product/service purchase, product/service experience or other transactions.

COOKIES

- You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly.

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.
- If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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 the table above.

- Internal Third Parties as set out below
- External Third Parties as set out below
- Specific third parties listed in the table above.

Third parties to whom we may choose to sell, transfer, or merge 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 Policy.

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

INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Such destinations may not have laws which protect your information to the same extent as in the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal

data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

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. 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.

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.
- Details of retention periods for different aspects of your personal data are set out in the table above.
- By law we have to keep basic information about our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for six years after they cease being customers for tax purposes.
- In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.
- In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). 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.

TIME LIMIT TO RESPOND

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.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies acting as joint controllers or processors with Endure it Limited and who are based in the United Kingdom.

EXTERNAL THIRD PARTIES:

- Service providers acting as processors provide various services such as event entry, entry management and supporting services, grant management services, timing services, services with respect to the dissemination of photos, videos and other memorabilia, facilitation services for graphical representation of results, data analysis services, publication of race results services and IT and system administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Third party companies such as:

- UK Athletics to populate the Power of 10 ranking system.
- Cider companies in the UK
- Hotel groups
- Broadcasters such as the BBC to allow them to commentate on our events.

Where you have consented to pass your personal data to third parties (for example, hotel groups about accommodation in relation to our events or charities). Media where We deem that there is a human-interest story about your participation at one of our events.

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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.