Development Through Challenge / Mile End Climbing Wall Privacy Notice

Registered company number: 02238901
Registered charity number: 299332
Operating as Mile End Climbing Wall

Version 3.0 – September 2026

1. About this Privacy Notice

Development Through Challenge is a charitable company operating Mile End Climbing Wall ("MECW", "the Wall", "we", "us" or "our").

Development Through Challenge is the data controller responsible for the personal information described in this Privacy Notice.

We are committed to protecting your privacy and handling your personal information fairly, lawfully and securely.

This Privacy Notice explains:

- what personal information we collect;
- how we collect it;
- why we use it;
- the lawful bases we rely upon;
- who we may share it with;
- how long we keep it;
- how we protect it; and
- the rights you have in relation to your personal information.

We process personal information in accordance with applicable UK data protection law, including the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 ("DPA 2018") and the Privacy and Electronic Communications Regulations 2003 ("PECR"), as amended.

Providing personal information to us is generally voluntary. However, there are circumstances where we need particular information in order to provide a service to you. For example, we may be unable to register you as a climber, administer your membership or complete a booking if you do not provide information that is necessary for those purposes.

2. How we collect personal information

Information you give us directly

We may collect personal information directly from you when, for example, you:

- register to use Mile End Climbing Wall;
- create an account or make a booking;
- take part in a course, programme, event or activity;
- enrol on or participate in a climbing or coaching scheme;
- purchase products or services;
- complete a form or survey;
- report an accident, incident or safeguarding concern;
- contact us by email, telephone, social media, in person or by post;
- subscribe to marketing or other communications;
- make a donation or otherwise support our charitable work; or
- apply for a job or other role with us.

Information we receive from other organisations

We may receive personal information about you from other organisations where this is necessary and lawful.

These may include, depending on the circumstances:

- the Association of British Climbing Walls;
- the ABC Training Trust/NICAS;
- training, qualification or awarding bodies;
- schools, colleges, local authorities or other organisations arranging activities with us;
- event or programme partners;
- booking service providers;
- insurers and professional advisers; and
- other organisations with which you have asked or authorised us to communicate.

Where we obtain your personal information from another source rather than directly from you, we will provide you with relevant privacy information where data protection law requires us to do so.

Information collected when you use our website and online services

When you use our website, booking systems or other digital services, we may collect technical and usage information such as:

- your IP address;
- device and browser type;
- operating system;
- approximate location derived from your device or IP address;
- pages visited and actions taken;
- dates and times of visits;
- referral information; and
- information collected through cookies and similar technologies.

Further information about cookies and similar technologies is provided in our Cookie Notice.

Publicly available information

We may sometimes obtain information from publicly available sources, including publicly available social media content, where it is relevant and lawful for us to do so.

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3. The personal information we may use

Depending on your relationship with us, we may process the following types of personal information.

Identity and contact information

This may include:

- your name;
- date of birth;
- address;
- email address;
- telephone number;

- emergency contact details;
- parent or guardian details where appropriate; and
- social media identity where you communicate with us through social media.

Membership, booking and activity information

This may include:

- membership and registration details;
- booking history;
- courses, sessions or events attended;
- climbing or coaching qualifications and experience;
- training and assessment records;
- information relevant to participation in programmes such as NICAS; and
- records of communications with you.

Payment and transaction information

We may retain information about transactions made with us, such as the date, amount and nature of a purchase, booking or refund.

We do not collect or retain customers' credit or debit card details or other payment-card information. Where card payments are made, payment information is handled by the relevant payment service provider.

Health, safety and safeguarding information

Where relevant to the safe provision of our services or activities, we may process information concerning:

- health or medical conditions;
- disabilities or access requirements;
- injuries;
- accidents and incidents;
- first aid or emergency treatment; and
- safeguarding concerns.

Some of this information is classed as special category personal data and receives additional protection under data protection law.

Photographs, video and CCTV

We may process:

- photographs and video taken in connection with our activities, events or communications; and
- CCTV recordings used for safety, security, incident management and the prevention and detection of crime.

Recruitment information

If you apply to work with us, we may process information including your:

- employment history;
- qualifications;
- experience;
- references; and
- other information provided as part of the recruitment process.

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4. Why we use your personal information and our lawful bases

Data protection law requires us to have a lawful basis for using personal information. The basis we use depends upon why we are using the information.

Purpose	Lawful basis we will normally rely upon
Registering you as a climber or member	Performance of a contract or taking steps before entering into a contract
Taking and administering bookings	Performance of a contract
Providing courses, coaching, events and other services	Performance of a contract and/or legitimate interests
Administering participation in schemes such as NICAS	Performance of a contract and/or legitimate interests
Responding to enquiries and requests	Contractual necessity and/or legitimate interests

Purpose	Lawful basis we will normally rely upon
Managing relationships with customers, partners, suppliers and service providers	Contract and/or legitimate interests
Keeping our facilities, staff, customers and visitors safe	Legitimate interests, legal obligation and, where appropriate, vital interests
Operating CCTV for security, safety and incident management	Legitimate interests
Investigating accidents, incidents, complaints and insurance matters	Legal obligation and/or legitimate interests
Preventing fraud, crime, misuse of our services or threats to safety	Legitimate interests, recognised legitimate interests where applicable, and/or legal obligation
Maintaining financial and accounting records	Legal obligation and legitimate interests
Establishing, exercising or defending legal claims	Legitimate interests
Improving our facilities, services, website and customer experience	Legitimate interests
Carrying out research, evaluation and impact measurement	Legitimate interests and, where appropriate, consent
Recruiting and selecting staff	Taking steps before entering into a contract, legal obligation and legitimate interests
Sending marketing and promotional communications	Consent
Complying with requests from regulators, law enforcement or other bodies where disclosure is legally required	Legal obligation and/or recognised legitimate interests where applicable

Our legitimate interests

Where we rely on legitimate interests, these may include:

- operating and developing Mile End Climbing Wall and Development Through Challenge;
- providing a safe and effective service;
- managing our relationship with customers and other stakeholders;
- maintaining security;
- preventing and investigating misuse, fraud and crime;
- improving our facilities and services;
- understanding how our services are used;
- administering and protecting our organisation;
- maintaining evidence relating to incidents, complaints and legal claims; and
- protecting the rights, property and safety of our organisation and others.

Before relying on legitimate interests, we consider whether the processing is necessary and whether your interests, rights or freedoms override our interests.

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5. Special category personal information

Some personal information receives additional protection under the UK GDPR. This includes information about matters such as health, ethnicity, religion, sexual orientation and biometric information used for identification.

The special category information we are most likely to process in connection with climbing and our other activities is health or disability information.

Where we process special category information, we need both a lawful basis for the processing and an additional legal condition permitting us to process that type of information.

Depending upon the circumstances, we may rely upon:

- your explicit consent;
- the protection of your or another person's vital interests where the legal requirements are met;
- the establishment, exercise or defence of legal claims;
- substantial public interest conditions permitted under the DPA 2018, including where applicable to safeguarding; or
- another condition specifically permitted by law.

We will only collect and use special category information where it is relevant and necessary for a legitimate purpose.

If we ask for health information to help us provide an activity safely, we will explain why we need the information and how it will be used.

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6. Marketing and communications

We may wish to keep you informed about activities, events, services, programmes, fundraising or other developments that we think may be relevant to you.

We currently send electronic marketing communications only where you have actively opted in to receive them.

When you sign up to receive marketing communications, we will make clear what you are signing up to receive.

You can change your marketing preferences or unsubscribe at any time by:

- using the unsubscribe facility contained in the communication; or
- contacting us using the details at the end of this Notice.

Withdrawing your consent does not affect the lawfulness of any communications sent before your consent was withdrawn.

We do not sell or rent your personal information to third parties for their own marketing purposes.

If you opt out of marketing, we may retain a limited record of your contact details on a suppression list so that we can continue to respect your request.

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7. Children's personal information

Children and young people take part in a number of our activities and we recognise that their personal information requires particular protection.

We aim to use children's personal information fairly, transparently and in a way that takes account of their age and understanding.

Depending upon the activity and the lawful basis we rely upon, information may be provided by or collected from:

- the child or young person;
- their parent or guardian;

- a school, local authority or other organisation responsible for arranging the activity; or
- another organisation appropriately authorised to provide the information.

There is not a general requirement for parental consent to all processing of children's information. We will identify the appropriate lawful basis according to the particular activity.

Where we provide an online service directly to a child and rely upon consent as the lawful basis for that processing, parental or guardian authorisation is normally required where the child is under 13.

Where our online services fall within the scope of the Children's Code, also known as the Age Appropriate Design Code, we will take appropriate steps to reflect the requirements of that Code.

Where appropriate, we may provide privacy information in a format designed specifically for children and young people.

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8. Cookies and similar technologies

Our website and online services may use cookies and similar storage or access technologies.

Some of these technologies may be necessary for the operation, security or functionality of our website and services. Others may be used for analytics, preferences or other purposes.

Where PECR requires consent before a technology is used, we will seek that consent.

Where an exemption from consent applies, we will ensure that the relevant legal requirements are met.

More detailed information about the technologies we use, their purposes and how you can control them is set out in our Cookie Notice.

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9. Who we share personal information with

We do not routinely disclose personal information to third parties unless there is a legitimate and lawful reason to do so.

Depending upon the circumstances, we may share relevant personal information with:

- the Association of British Climbing Walls;

- the ABC Training Trust/NICAS;
- schools, colleges, local authorities and organisations arranging activities with us;
- training and awarding bodies;
- healthcare professionals and emergency services;
- insurers;
- legal, accounting and other professional advisers;
- website, IT, cloud storage, communications and cybersecurity providers;
- booking service providers;
- contractors and suppliers providing services on our behalf;
- funders, evaluators and research partners where necessary and lawful;
- regulators, government bodies, courts and law enforcement agencies; and
- other organisations where you ask or authorise us to share information with them.

Where possible, information provided to funders or for research and evaluation purposes will be anonymised or aggregated so that individuals cannot be identified.

Where an organisation processes personal information on our behalf, we require it to provide appropriate data protection and security safeguards.

We may also disclose information:

- where we are required to do so by law;
- in connection with legal proceedings or legal advice;
- where necessary to protect someone's vital interests;
- to prevent or investigate crime, fraud or serious misuse; or
- in connection with a reorganisation, merger, transfer or disposal of all or part of our operations, provided appropriate safeguards are put in place.

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10. How long we keep personal information

We keep personal information only for as long as it is reasonably necessary for the purposes for which it was collected, including to meet legal, regulatory, safeguarding, insurance and operational requirements.

Our normal retention periods include:

CCTV footage

CCTV footage is normally retained for 30 days.

Where footage is required in connection with an accident, incident, safeguarding matter, investigation or legal claim, the relevant footage may be retained for longer in accordance with the retention period applicable to that matter.

Membership and customer records

Membership information is renewed or refreshed every two years.

We may retain membership records for as long as they continue to be necessary for administering an individual's relationship with Mile End Climbing Wall and for associated safety, operational or legal purposes.

We periodically review the personal information we hold and information that is no longer required will be deleted or anonymised in accordance with our retention arrangements.

You may also ask us to delete personal information we hold about you, although the right to erasure is subject to certain legal exceptions.

Accident and incident records

For adults, accident and incident records are normally retained for six years.

Where an accident or incident involves someone under the age of 18, records are normally retained until six years after that individual reaches the age of 18.

Information may be retained for longer where this is necessary because of an ongoing investigation, insurance matter, legal claim or other lawful reason.

Safeguarding records

Safeguarding information may need to be retained for an extended period because concerns, allegations or patterns of behaviour can remain relevant many years after an event.

We therefore retain safeguarding records for as long as there remains a safeguarding, legal or regulatory reason to do so.

Safeguarding records are periodically reviewed to ensure that continued retention remains necessary and appropriate.

Recruitment records

Information relating to unsuccessful job applicants is normally retained for six months after completion of the recruitment process, unless there is a specific and lawful reason to retain it for longer.

Financial and accounting records

Financial and accounting records are retained for the period required by applicable accounting, tax, company and charity law.

Marketing preferences

Where you have asked us not to send you marketing communications, we may retain limited contact information on a suppression list for as long as necessary to ensure that we continue to respect that request.

When personal information reaches the end of its retention period and there is no lawful reason to retain it for longer, we will securely delete or anonymise it.

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11. How we protect personal information

We take appropriate technical and organisational measures to protect personal information against:

- unauthorised or unlawful access;
- accidental loss;
- destruction or damage;
- inappropriate disclosure; and
- unauthorised alteration.

These measures may include, where appropriate:

- access controls;
- password and authentication controls;
- secure systems and storage;
- backups;
- staff training;
- appropriate policies and procedures;
- contractual controls over service providers; and
- measures for detecting and responding to security incidents.

Access to personal information is limited to staff, contractors and service providers who need it for legitimate purposes.

Our personal information is currently stored on servers located in the United Kingdom.

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12. International transfers

We currently store the personal information covered by this Notice on servers located within the United Kingdom.

If we introduce a service or supplier in the future which results in personal information being transferred outside the UK, we will ensure that any restricted international transfer complies with UK data protection law.

This may include relying upon:

- UK adequacy regulations;
- the UK International Data Transfer Agreement;
- the UK Addendum to the EU Standard Contractual Clauses; or
- another transfer mechanism permitted under UK data protection law.

Where required, we will also assess whether appropriate safeguards are provided in practice.

You may contact us if you would like further information about international transfers of your personal information.

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13. Your data protection rights

Depending upon the circumstances and the lawful basis on which we use your information, you may have the following rights.

Right of access

You can ask us whether we process your personal information and request a copy of that information together with information about how it is used.

This is commonly known as a subject access request.

Right to rectification

You can ask us to correct inaccurate personal information or complete information that is incomplete.

Right to erasure

In certain circumstances, you can ask us to delete your personal information.

The right to erasure is not absolute. We may need to retain information where there is a lawful reason to do so, for example to meet a legal obligation, deal with a safeguarding matter or establish, exercise or defend a legal claim.

Right to restrict processing

In certain circumstances, you can ask us to restrict the way we use your personal information.

Right to object

You may have the right to object where we process your personal information on the basis of legitimate interests.

You have an absolute right to object to the use of your personal information for direct marketing.

Right to data portability

Where we process information you have provided to us:

- by automated means; and
- on the basis of your consent or because the processing is necessary for a contract,

you may have the right to receive that information in a structured, commonly used and machine-readable format and, where technically feasible, ask us to transfer it to another data controller.

For this purpose, processing by automated means refers to computerised processing rather than paper records.

Right to withdraw consent

Where we rely upon your consent, you may withdraw it at any time.

Withdrawing consent does not affect the lawfulness of processing that took place before consent was withdrawn.

Exercising your rights

You can exercise your rights by contacting us using the details at the end of this Notice.

We may need to ask for information to confirm your identity before disclosing personal information or acting upon a request.

We will respond within the time limits required by data protection law. In most cases, requests relating to individual rights must be dealt with without undue delay and within one month, although the law allows an extension in certain circumstances.

Some rights are subject to conditions and exemptions. We will explain our reasons if we cannot comply fully with a request.

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14. Automated decision-making

We do not currently make decisions about individuals based solely on automated processing where those decisions have legal or similarly significant effects.

If we introduce this type of processing in the future, we will provide appropriate information about it and put in place any safeguards required by data protection law.

These safeguards may include:

- providing information about the decision;
- allowing you to make representations about it;
- allowing you to obtain human intervention; and
- allowing you to challenge the decision.

Additional restrictions apply where special category personal information is used for significant automated decision-making.

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15. Data protection complaints

If you have concerns about the way we collect or use your personal information, we encourage you to contact us so that we can investigate and try to resolve the matter.

You can make a data protection complaint using the contact details at the end of this Notice.

We will:

- acknowledge your complaint within 30 days of receiving it;
- take appropriate steps to investigate it without undue delay;
- keep you appropriately informed about the progress of our investigation; and
- tell you the outcome without undue delay.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

The ICO can be contacted through its website at www.ico.org.uk or at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You do not have to complain to us before approaching the ICO, although giving us an opportunity to investigate may enable the matter to be resolved more quickly.

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16. Links to other websites and services

Our website may contain links to websites or services operated by other organisations.

This Privacy Notice does not apply to those organisations and we are not responsible for their privacy practices.

We encourage you to read the privacy information provided by any external website or service you use.

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17. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect:

- changes to our activities or services;
- changes in the way we use personal information;
- changes in technology;
- changes in our suppliers or systems; or
- changes in legal or regulatory requirements.

Where a change is significant, we will take reasonable steps to bring it to the attention of affected individuals.

The current version of this Privacy Notice will be made available on our website.

This Privacy Notice was last updated in September 2026.

18. How to contact us

If you have any questions about this Privacy Notice, wish to exercise a data protection right or want to make a data protection complaint, please contact:

Data Protection Lead
Development Through Challenge / Mile End Climbing Wall
Haverfield Road
London
E3 5BE

Email: enquiries@mileendwall.org.uk or info@dtccharity.org
Telephone: 020 8980 0289

Please mark written correspondence for the attention of the Data Protection Lead.

I'd be happy to turn this next into a properly formatted V3.0 Word/PDF version matching the existing MECW document style, but in terms of the substantive privacy notice, this is the finished text.