

Scuba EdVentures

PRIVACY POLICY

Version 1.2

Effective from: 26 September 2026

Next review due: September 2027 (or sooner, following any incident or change in the law)

Owner: Director

Scuba EdVentures Ltd, company number 15923090

57 Hobart Road, Loddon, Norfolk, NR14 6LD

Overview

Scuba EdVentures (SEV) collects personal data from the moment someone first enquires about a trip through to years after a course finishes, when SEV may still need to show what training took place. This policy explains what SEV collects, why, how long it's kept, and the rights anyone whose data SEV holds can use under the UK GDPR and the Data Protection Act 2018.

It covers SEV's website and the participants, parents, schools, staff and delivery partners SEV deals with. It sits alongside the Safeguarding Policy, which covers data protection from a child-welfare and internal-conduct angle, and the Health & Safety Policy, which covers the medical screening every participant goes through before diving. In this policy, 'participant' means anyone taking part in an SEV trip or course, from school pupils through to college and university students.

Persons responsible

Role	Who / responsibility
Director	Ian Brown. Overall responsibility for this policy and for SEV's compliance with data protection law. Acts as SEV's data protection contact for anyone wanting to exercise a right or raise a concern under this policy. Contact: 07491826684 / ian@scubaedventures.co.uk .
Designated Safeguarding Lead (DSL)	Zara Dyer. First point of contact for anything that touches a participant's welfare or safety, including matters raised under this policy. Contact: concerns@scubaedventures.co.uk .
Deputy DSL	Ian Brown. Covers when the DSL is unreachable, including during trips abroad.

Our policy

1. Policy statement

Scuba EdVentures Ltd is the data controller for the personal data this policy covers. Much of what SEV collects, medical questionnaires and information about participants under 18, is sensitive by nature, so SEV only collects what a trip actually needs, uses it for the purposes set out below, and keeps it secure.

- **Company:** Scuba EdVentures Ltd, company number 15923090
- **Address:** 57 Hobart Road, Loddon, Norfolk, NR14 6LD
- **Email:** enquiries@scubaedventures.co.uk
- **Phone:** 07491826684

2. Information SEV collects

- **Provided directly:** contact details (name, email, phone number, postal address); booking details (course preference, dive experience, emergency contact); medical information (medical questionnaires, fitness declarations, dietary requirements, allergies); certification details (diving qualifications, certification numbers, training records); payment details (billing address — card and payment details themselves are handled by SEV's payment provider, not stored by SEV); identity documents (age or ID verification for certain courses); and anything sent in an enquiry, message or piece of feedback.

- **Collected automatically:** when someone visits the website, SEV's hosting and analytics tools pick up IP address, browser and device type, and which pages are visited. See SEV's Cookie Policy for how cookies specifically work and how to manage them.
- **From third parties:** certification agencies (PADI, SSI and other diving organisations, to verify a qualification), insurers (for cover and claims), and partner dive centres (when arranging a trip together).

3. Why SEV uses this information

- **Running trips and courses:** taking bookings, preparing risk assessments, keeping training records, issuing certifications, and arranging accommodation, transport and equipment.
- **Safety and legal compliance:** checking medical fitness to dive (see the Health & Safety Policy, Section 4), keeping emergency contacts up to date, meeting diving industry and health & safety regulations, and handling insurance.
- **Communication:** replying to enquiries, sending booking confirmations and course information, safety updates, and conditions ahead of a trip.
- **Marketing, with consent:** newsletters, information about new trips and courses, customer surveys. Anything involving a participant's photo or name follows the Safeguarding Policy's consent and takedown rules (Section 12), not this policy alone.
- **Running the business:** taking payment, keeping financial records, understanding how the website is used, and preventing fraud.

4. Legal basis for processing

- **Contract:** to do what SEV has agreed as part of a booking.
- **Legal obligation:** to meet diving industry regulation, safety requirements and tax law.
- **Legitimate interests:** to run the business, improve the trips SEV offers, and keep everyone safe.
- **Consent:** for marketing communications and non-essential cookies — this can be withdrawn at any time.
- **Vital interests:** in an emergency, to protect someone's health and safety.

5. Who SEV shares information with

- **Service providers who help run a trip:** payment processors, certification agencies, insurers, accommodation and transport providers, and equipment suppliers.
- **Emergency and legal situations:** emergency services and medical professionals if something happens on a trip, regulators, and law enforcement where the law requires it.
- **Delivery partners:** the overseas dive centres and resorts that actually run the diving, and the wider diving and travel networks SEV works within.

Every third party is expected to keep this information secure and use it only for the reason it was shared.

6. Sending information abroad

Diving happens overseas, so some personal data is sent outside the UK — to certification agencies, delivery partners, and anyone else needed to run a trip in that country. Where this happens, SEV puts safeguards in place (an adequacy decision, standard contractual clauses, or another approved mechanism) so the data stays protected to a UK standard.

7. How long SEV keeps information

- **Training and certification records:** 7 years, or until the participant's 21st birthday if that is later, or longer where a certification agency requires it.
- **Medical information:** 7 years after the last service it relates to, or until the participant's 21st birthday if that is later.
- **Booking and payment records:** 7 years, for tax and accounting purposes, or until the participant's 21st birthday if that is later.
- **Marketing consent:** until it's withdrawn, or after 3 years without contact.

- **Website analytics:** 26 months.
- **CCTV footage:** 30 days, where used.

Data is securely deleted or anonymised once it's no longer needed.

8. Keeping information secure

- **Technical measures:** encryption, secure servers, and firewall protection.
- **Physical security:** locked storage for paper records, and restricted access to premises.
- **Administrative controls:** staff training, access controls, and regular review of who can see what.
- **Third-party due diligence:** checks on the third parties SEV shares data with before they're used.
- **Incident response:** a plan for identifying, containing and reporting a data breach if one happens.

9. Your rights

Under the UK GDPR, anyone whose data SEV holds can:

- ask for a copy of it, or for it in a portable format;
- ask for something inaccurate or incomplete to be corrected;
- ask for it to be deleted, or for processing to be restricted, subject to SEV's own legal obligations (for example, records it must keep for tax or safety reasons);
- object to processing based on legitimate interests, and withdraw consent for marketing at any time;
- complain to the Information Commissioner's Office (ICO) — ico.org.uk, 0303 123 1113.

Contact the Director (see Persons responsible) to use any of these rights. Requests are responded to within one month.

10. Cookies

SEV's website uses cookies and similar technologies. See SEV's separate Cookie Policy for the detail: what each cookie does, the analytics and tracking involved, and how to manage preferences.

11. Children's data

Many SEV participants are under 18, so this matters more here than for most businesses. For under-18s, parental or school consent is obtained before they take part, extra care is taken with how a child's data is collected and used, and only what a trip actually needs is collected. The Safeguarding Policy sets out the fuller child-protection framework this sits within.

12. Reviewing and updating this policy

This policy is reviewed at least once a year, and sooner after any incident or change in the law. Updates are posted on the website, and anyone significantly affected by a change is told directly. A record of previous versions is kept on file.

13. Complaints and how to contact SEV

Anyone with a question about this policy, or who wants to use one of the rights in Section 9, can contact the Director using the details in Persons responsible. A complaint about how SEV has handled personal data that isn't resolved directly can be taken to the Information Commissioner's Office (ICO) — ico.org.uk, 0303 123 1113.

14. Specific situations

- **Medical information:** processed for safety and shared with medical professionals in a genuine emergency (see also the Health & Safety Policy, Section 5).
- **Certification records:** kept to the standard the relevant certification agency requires, and accessible to that agency where needed to verify a qualification.
- **Emergencies:** personal information may be shared immediately with emergency services, medical facilities and relevant authorities where someone's safety depends on it.

- **Insurance claims:** personal data may be processed and shared with insurers, medical professionals and legal representatives as part of a claim.

Documentation

- SEV's Safeguarding and Child Protection Policy (Section 12 — photography, images and social media; Section 14 — information sharing, records and data protection).
- SEV's Health & Safety Policy (Section 4 — medical screening before diving).
- SEV's Booking Terms & Conditions.
- SEV's Cookie Policy (published on the website).

Appendix 1

References and further guidance

- **UK GDPR and the Data Protection Act 2018** — the legal basis for this policy. [gov.uk / legislation.gov.uk](https://www.gov.uk/legislation.gov.uk).
- **Information Commissioner's Office (ICO)** — the UK's data protection regulator. ico.org.uk, 0303 123 1113.
- **SEV's Cookie Policy** — published on the website, covers cookies and website analytics in detail.