



Privacy Policy

We appreciate your interest in our Privacy Policy. At MacEverest, we take the protection of your data very seriously, and in the below we explain what data we collect when you use our website www.maceverest.co.uk and how it is used.

General Information

a) What law applies?

Our use of your Personal Data is subject to both the UK's Data Protection Act ("DPA") and the EU's General Data Protection Regulation ("GDPR"), and of course we process your Personal Data accordingly.

b) What is Personal Data?

Personal Data is any information relating to personal or material circumstances that relates to an individual. This may include a name, date of birth, e-mail address, postal address, or telephone number but also online identifiers such as IP addresses or device ID's.

c) What is processing?

"Processing" means any operation or set of operations which is performed upon Personal Data, whether by automatic means or not. The term is broad and covers virtually any handling of data.

d) Who is responsible for data processing?

The responsible party within the meaning of the DPA and the GDPR is MacEverest of 32 Shore road, Innellan, Dunoon ("MacEverest", "we", "us", or "our"). If you have any questions about this policy or our data protection practices, please contact us at info@maceverest.co.uk.

e) What are the legal bases of processing?

In accordance with the DPA and the GDPR, we must have at least one of the following legal bases to process your Personal Data:

- *For the fulfilment of contractual obligations*
 - The purposes of the data processing are primarily based on the service we provide.
- *Within the framework of our legitimate interests*

Where necessary, we process your data beyond the actual performance of the contract to safeguard legitimate interests of us or third parties. Examples are:

 - Ensuring IT security and IT operations,
 - Measures for business management and further development of our services,
 - Defence against third-party claims and enforcement of own claims.
- *Based on your consent*
 - Insofar as you have given us your consent to process personal data for certain purposes.

f) Is there an obligation for me to provide data?

Within the scope of our business relationship, you are only required to provide personal data that is necessary for the establishment, implementation, and termination of a business relationship or that we are legally obliged to collect. Without this data, we will usually have to refuse to conclude the contract or will no longer be able to perform an existing contract and may have to terminate it.

Data we collect automatically

a) Log data

Each time you visit our website, our system automatically records the following data from the visiting device and stores it in a so-called log file: i) Name of the retrieved file, ii) date and time of the visit, iii) amount of data transferred, iv) message about successful retrieval, type of browser and version used, v) IP address (identification of the user's device), vi) Operating system of the visiting device, vii) Internet



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service provider of the visiting device, viii) website from which you access our website, and ix) which of our website pages you are accessing. The legal basis for processing is our legitimate interest.

b) Hosting

The hosting service used by us for the purpose of operating our website is [Fasthosts Internet Limited](#). In doing so Fasthosts processes inventory data, contact data, content data, usage data, meta data and communication data of customers, interested parties and visitors of our website and services, on the basis of our legitimate interests.

c) Content Management System

We use the Content Management System (CMS) of WordPress by [Automattic Inc](#), to publish and maintain the created and edited content and texts on our website. This means that all content and texts submitted to our website is transferred to WordPress. The legal basis for this processing is our legitimate interest.

d) Fonts

We use Google Fonts by [Google LLC](#), on our website to display external fonts. To enable the display of certain fonts on our website, a connection to the Google server in the USA is established when our website is accessed. The connection to Google established when you call up our website enables Google to determine which website sent your request and to which IP address the display of the font is to be transmitted. This represents a legitimate interest.

e) Use of cookies

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies:

- a) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and
- b) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyse your behaviour on a website (“analytical” cookies) or cookies used to display advertisements to you (“advertising” cookies).

However, as we think it is important that you should have full control over your privacy online, we have refrained from placing Non-essential Cookies on our website and as such we are not required to obtain any consents in accordance with the UK’s Privacy and Electronic Communications Regulations (“PECR”) and the EU counterpart the Privacy and Electronic Communications Directive (“PECD”) . Nonetheless, this may change, and we ask you to regularly check this policy for any updates.

Data we collect directly

a) Contacting us

In addition to your name, company name, and e-mail address, IP address or telephone number, if provided, we usually collect the context of your message which may also include certain Personal Data. The Personal Data collected when contacting us is to handle your request and the legal basis is both your consent and contract.

b) Registration for events and workshops

When you register for our events, we process your first name, last name, e-mail address, and address, Date of Birth and Emergency Contact Name and Number. Our registration form is used on the basis of our legitimate interest in planning and conducting our events, the initiation of a contract and your consent. The data you enter in the form will remain with us until you request us to delete it, revoke your consent to store it or the purpose for storing the data no longer applies.



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c) Participation in our Events

We process the Personal Data involved in your participation in our events to be able to provide our contractual services. This includes our support, correspondence with you, fulfilment of our contractual, accounting and tax obligations. The data processed includes the master data of our contractual partners (e.g., names and addresses), contact data (e.g., e-mail addresses and telephone numbers) as well as contractual data (e.g., specific events booked, contents of the contract, contractual communication, names of emergency contact persons) and financial data. Accordingly, the data is processed on the basis of fulfilling our contractual obligations and our legal obligations.

d) Payment Data

If you make a purchase your payment will be processed via our payment service provider [Stripe](#). Payment data will solely be processed through Stripe and we have no access to any Payment Data you may submit. The legal basis for the provision of a payment system is the establishment and implementation of the contract.

e) Administration, financial accounting, office organisation, contact management

We process data in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process while providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

Social Media

We have a presence on social media based on our legitimate interest (currently, [Instagram](#)). If you contact or interact with us via social media platforms, we and the respective social media platform are jointly responsible for the processing of your data and enter into a so-called joint-controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contractual performance, if any.

We refer to our offered social media presences with links. Unlike social media plugins, links do not cause the social media platform to learn of your visit when you access our site. However, like any link, they do lead to your data being processed by the social media platform at the latest when you click on the link. As a rule, the social media platform stores cookies on your device or even your usage behaviour in your account, especially if you are logged in yourself. The social media platform may use your data to analyse your usage behaviour and use it for (interest-based) advertising. This may result in advertising being displayed to you inside and outside the social media platform.

General Principles

a) Who receives my data?

Within MacEverest, those that need your data to fulfil our contractual and legal obligations will receive access to it.

Processors used by us may also receive data for these purposes. These are companies in the categories of IT services, telecommunications, and sales and marketing. Where we use processors to provide our services, we take appropriate legal precautions and corresponding technical and organisational measures to ensure the protection of personal data in accordance with the relevant legal provisions.

Data is only passed on to third parties within the framework of legal requirements. We only pass on users' data to third parties if this is necessary, for example, for contractual purposes or on the basis of legitimate interests in the economic and effective operation of our business or you have consented to the transfer of data.

b) How long will my data be stored?

As far as necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract. In addition,



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we are subject to various storage and documentation obligations, which result from the minimum statutory retention periods and HMRC, among others. The retention and documentation periods specified there are 2 to 6 years.

c) How do we secure your data?

Our website uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of content or contact requests that you send to us. We have also implemented numerous security measures (“technical and organisational measures”) for example encryption or need to know access, to ensure the most complete protection of Personal Data processed through this website.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

d) Is data transferred to a third country or to an international organisation?

We may transfer your Personal Data to other companies and/or staff members as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

e) Special Category Data

Unless specifically required when using our services and explicit consent is obtained for that service, we do not process special category data.

f) Minors

We do not request Personal Data from minors and children and do not knowingly collect such data or pass it on to third parties.

g) Automated decision-making

Automated decision-making is the process of making a decision by automated means without any human involvement. Automated decision-making including profiling does not take place.

h) Do Not Sell

We do not sell your Personal Data.

Your Rights and Privileges

a) Privacy rights

Under the DPA and GDPR, you can exercise the following rights:

- *Right to information*
- *Right to rectification*
- *Right to object to processing*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*
- *Right to complain to a supervisory authority*
- *Right not to be subject to a decision based solely on automated processing.*

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

b) Updating your information



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If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so by contacting us.

c) Withdrawing your consent

You can revoke consents you have given at any time by contacting us. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

d) Access Request

If you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

e) Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in Scotland is: The Information Commissioner's Office – Scotland, Queen Elizabeth House, Sibbald Walk, Edinburgh, EH8 8FT, Telephone: 0303 123 1115 www.ico.org.uk. However, we would appreciate the opportunity to address your concerns before you contact the ICO.

Validity and questions

This Privacy Policy was last updated on Friday, 15th of December 2023, and is the current and valid version. However, we want to point out that from time to time due to actual or legal changes a revision to this policy may be necessary. If you have any questions about this policy or our data protection practices, please contact us using our contact form on the website at www.maceverest.co.uk or email info@maceverest.co.uk.