



Privacy policy

Introduction: This policy sets out how and why we collect and use your personal information and what we do with it. It also explains your rights, and the purpose and legal basis we rely on when processing that information.

Personal information: This is any information that we hold about and you and which identifies you. It includes: your name and address; contact details, for example, phone number, email address and emergency contact; social media profile(s); date of birth and gender; financial information; images; and information about any electronic device you use to visit our website, or use to log onto the Wall's Wi-Fi connection.

Collection: We collect information about you in the following ways: when you sign a registration form before you climb; when you pay for membership or any other product or service, for example, our point of sale system (**POS**), tracks your use of the centre through a unique identification number you receive on your second visit; accessing our website and Wi –Fi through cookies (please see our separate Cookie policy) and similar technologies; when you contact us directly, over the phone, by email or through social media; through cameras over the reception area (for security) and at the POS system to take your picture (if for example, you purchase annual membership); and when you provide your details as part of your employment with us.

Purpose and legal basis: The purpose and legal basis on which we use and process your personal information are set out below.

Purpose for processing	Legal basis
Communicating and providing our products and services to you. Operating our website and point of sale system.	To support our legitimate interests in managing our business and providing products and services to you and our customers, provided such interests are not overridden by your rights and interests
Marketing to you about our services.	Your consent, which you may withdraw at anytime
For the prevention and detection of fraud and other crimes and dealing with a request from a statutory body including a	To comply with our legal obligations

court.	
Transferring information to third parties, including to our service providers, legal representatives and insurers.	a. To support our legitimate interests in managing our business and providing services to our customers provided such interests are not overridden by your rights and interests; b. to comply with our legal obligations; or c. to protect vital interests.
Employing people to work with us	a. To support our legitimate interests in managing our business and providing services to our customers provided such interests are not overridden by your rights and interests; b. to comply with our legal obligations; or c. to perform or enter into a contract with our employees.

Your rights: The following is a summary of your rights regarding the information we process about you:

- **Rectification:** if information we hold about you is incorrect you can ask us to change it.
- **Access:** you can also ask what information we hold about you and you are entitled to be provided with a copy.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances.
- **Portability:** you can request the transfer of your information to you, or to a third party, in a format that can be read by computer in certain circumstances.
- **Restriction:** you can ask us to restrict how we use your information.
- **Object:** you may object to us using your information in certain circumstances.
- **Complaint:** you have the right to make a complaint to the Data Protection Commission if you feel we have acted unlawfully.

Children: We will not process children's information without their parent's or legal guardian's consent.

Security and storage: We use a variety of physical and technological measures to ensure your personal information is protected from unauthorised access and disclosure. We will only keep your personal information for as long as we need to. The amount of time will depend on what we are using the information for and the legal basis we rely on for processing your information as set out in this policy.

Sharing: We may disclose personal information to third parties. These include: service providers whom we use in the course of our business; statutory bodies; where we are under a legal obligation; a purchaser of our business; and our legal and tax advisers, insurers and the courts. Where we transfer personal data outside of the European Economic Area, we will ensure that appropriate safeguards are put in place to protect any personal data. For example, transfers to the United States will only occur where the transferee is certified under the Privacy Shield Framework for data transfers.

Links to other websites: If you follow a link from our website – www.thewall.ie to another website (e.g. Facebook, Stripe, Paypal, Twitter) then this policy will not apply to any website you subsequently visit. Each website has its own privacy policy which you will need to check.

Changes to this policy: We may make changes to this policy as necessary to ensure it is up to date and reflects our legal obligations to you and best practice. Changes will be reflected in the policy on our website.

Contacting us: If you have any queries regarding this policy or any personal data we hold, or process about you, then please email info@thewall.ie with your query. Please put “Data Protection Query”, in the subject bar and mark the query for the attention of the “Wall’s Data Protection Officer”.