

Data Protection and Privacy

User Guide

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Purpose

The Long Distance Walkers Association is an association of people with the common interest of walking long distances in rural, urban, mountainous or moorland areas. The LDWA allows like-minded long distance walkers to gain access to information on walking events and long distance routes across the UK. The LDWA comprises of a network of local groups across the UK who arrange social and challenge walk events. The LDWA is recognised as a national governing body (NGB) for rambling by Sport England, Sport Scotland and Sport Wales.

The National Executive Committee (NEC) is the governing body of the Long Distance Walking Association.

This User Guide explains how the LDWA will process the personal data of its members, website users, event participants and activities and all others who may give us personal information (collectively called “Data Subjects”).

This User Guide also provides guidance to individuals acting on behalf of the LDWA and/or its Local Groups. This includes personal data held on the LDWA’s main website at www.ldwa.org.uk and also any subsidiary websites operated by Local Groups.

This User Guide is an interpretation of the LDWA’s Data Protection Policy, although the Policy will always take precedence if there is any inconsistency between this User Guide and the Policy.

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1. Executive Summary

The Long Distance Walkers Association (LDWA) values your privacy and is committed to protecting your personal information. This guide explains how we collect, use, store, and safeguard data for members, event participants, and volunteers.

Why we collect data

- To manage membership and events.
- To keep you informed about LDWA activities.
- To ensure safety during walks and challenge events.

Our key principles

- **Lawfulness:** We only use your data for clear, legal reasons.
- **Fairness and Transparency:** We tell you what we collect and why.
- **Data Minimisation:** We only keep what we need.
- **Accuracy:** We keep your information up to date.
- **Security:** We protect your data with strong safeguards.

Your rights

- Access your data.
- Correct inaccurate information.
- Request deletion where possible.
- Control how we contact you.

Retention

We keep data only as long as necessary for legal, safety, and operational reasons. Some records (e.g., achievements) may be kept indefinitely for historical purposes, but you can request anonymisation.

Our commitment

LDWA complies with UK GDPR, the Data Protection Act 2018, and the Data Use and Access Act 2025. We follow best practice and review this guide regularly. For full details, see the sections on lawful basis, privacy notices, retention periods, and your rights.

2. Understanding Key Data Protection Terms

Defining Personal Data

The ICO (Information Commissioners Office) defines personal data to be “data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.”

Controller: The ICO defines a controller as: “Controllers are the main decision-makers – they exercise overall control over the purposes and means of the processing of personal data.”

3. Data Lawfulness, Fairness and Transparency

Context

For processing of personal data to be lawful, the LDWA must need to identify specific grounds for the processing; this is called a lawful basis for processing (the legal reason for using your data).

Personal data must be processed fairly and lawfully. If processing is unfair, LDWA breaches this principle; even if a legal reason for using the data exists. Transparency means being clear and honest from the start about who we are and how we use personal data.

The LDWA Commitments

The LDWA will:

- Ensure all personal information will be processed in accordance with the LDWA's Data Protection Policy and Data Protection legislation.
- Ensure that a legal reason for using personal data is identified in advance of any processing taking place.
- Ensure that appropriate cookie and privacy notices are in place advising data subjects how and why their data is being processed.
- Not sell personal information to any third party.
- Not transfer data outside of the European Economic Area or a country with which the UK has an adequacy agreement without appropriate contractual safeguards being put in place.

Activity	Lawful basis	Plain English
Membership management	Contract necessity	We need your data to provide membership services you signed up for.
Financial reporting	Legal obligation	We must keep certain records to comply with the law.
Emergency health situations	Vital interests	We use your data to protect your life or safety in an emergency.
Event promotion	Consent	We only send marketing if you've opted in and given permission.
Safeguarding minors/vulnerable adults	Legal obligation & explicit consent	We process data to protect individuals and meet safeguarding laws.

Under the Data Use and Access Act 2025, certain activities such as responding to emergencies, safeguarding individuals, and detecting crime are now recognised legitimate interests. These do not require a Legitimate Interests Assessment. Cookie consent rules have also been relaxed for low-risk cookies (e.g., service improvement), but transparency obligations remain. Maximum fines for PECR breaches now align with UK GDPR: up to £17.5 million or 4% of global turnover

Special Category Personal Data

This includes the following sensitive personal data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
- an individual's health;
- a natural person's sex life or sexual orientation

Whilst not considered special category data there is additional sensitivity around

- financial information, and
- criminal convictions or offences.

The LDWA may process special category data to:

- Understand the composition of its membership and better understand how to sustain and increase its membership.
- Safeguard children and individuals at risk

- To safeguard and protect the best interests of data subjects in the event of an emergency e.g. health problems.

Case Study:

During a 100-mile challenge event, a participant collapsed due to dehydration. The organiser accessed emergency contact details and medical information provided during registration to alert paramedics and inform family members. This shows why LDWA collects health and emergency contact data and why the lawful basis is vital interests.

Special Category Data – Minors (Under 18)

When processing data for individuals under 18, LDWA must comply with the requirements of the Age Appropriate Design Code. These include:

- High privacy settings by default.
- No use of nudge techniques to weaken privacy.
- Clear, age-appropriate explanations of how data is used.

The LDWA retains names and details that have been provided by parents and guardians.

Anyone under 18 can ask for their details to be removed from the national membership database. We will do this within one month of receiving the request.

Children and young adults under the age of 18 may ask not to receive any group membership correspondence of any kind. This will be managed by deleting any email address attached to their name.

Most Challenge Events are entered by adults. Young adults aged 16–17 can enter directly, and their details are managed like adult entries. Parents or guardians may enter children under 16, providing their personal data to organisers. In addition, schools and colleges providing secondary education (not universities or colleges providing higher education) may enter the names of students under their care.

Social Walks are normally attended by adults. However, young adult family members aged 16 or 17 may take part without a family member present. In addition, parents or guardians may bring children aged under 16. The same rules for holding information apply to anybody under 18 as if they are adults.

Names and personal details of minors aged less than 16 years of age claiming a hillwalking or national trails achievement on the Register must be entered by the parent or guardian. Names and personal details of those aged 16 or 17 must be entered by the young adult concerned.

No personal information will be stored, processed or published about those aged less than 16 years without the consent of their parent or guardian, unless it is for safeguarding reasons.

No personal information will be stored, processed or published about vulnerable adults without the consent of their legal guardian, unless it is for safeguarding reasons.

What is Direct Marketing?

Direct marketing applies when NEC or Local Groups use data to promote products, services, or events. This includes::

- Promote membership;
- Advertise LDWA events and activities; and
- Promote non-LDWA events and activities.

Genuine market research, e.g. surveys and routine servicing communication is not considered as marketing. Genuine research cannot evolve into an invitation to market, advertise or promote products, services, aims or ideals.

For clarity, the LDWA considers the following examples of contact with individuals as not meeting the definition of marketing (not exhaustive):

- to check why they did not attend a particular activity they signed up to;
- to understand why an activity was not of interest;
- to understand why they wish to join/leave the LDWA;
- to follow up on outstanding membership subscriptions;
- to provide information of changes/cancellations to an event; or
- to follow up on a query the individual raised initially.
- Governance matters; NEC/Local Group elections and AGM's.

When is Marketing 'Solicited' and when is it 'Unsolicited'?

Put simply, a solicited message is one that is actively requested. So if someone specifically asks NEC/Local Groups to send them some information as a one-off, NEC/Local Groups can do so without worrying about whether it falls under Direct Marketing rules.

An unsolicited message is any message that has not been specifically requested. So if the individual has consented or 'opted in' to receiving marketing from NEC/Local Groups, it means the individual agrees to future messages and enables the LDWA to comply with the e-privacy Directive.

Obtaining Consent or 'Opting In'

Marketing can be conducted by the LDWA where data subjects, both members and non-members, actively consent to receiving direct marketing and the specified medium e.g. Phone, email, text. Consent must not be assumed, and the data subject has the right at any time to withdraw consent.

NEC/Local Groups must keep clear records of what a data subject has consented to, and when and how the consent was obtained, so it can demonstrate compliance in the event of a complaint.

- How does LDWA generally obtain consent?

When joining the LDWA a member will be asked whether they wish to provide consent to receiving:

- National communications;
- Local Group communications; and
- Associated Groups communications.

Direct marketing to LDWA members is restricted to the bulk mailing system and the three different categories above.

Consent can be revoked easily at any time by the member logging on to the membership website at www.sientries.co.uk and editing their preferences to stop receiving emails generated from the bulk mailing system that are not directly associated with their continued membership.

Direct marketing emails must not be sent from any other medium as NEC/Local Groups have no robust way of recording whether members have consented.

NEC/Local Groups may also utilise social media for marketing to members and non-members. Members must freely sign up to these services (rather than being automatically opted-in) and have the opportunity to opt-out or leave these platforms whenever they wish.

- Other Relevant Direct Marketing Legislation

Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR)

This is derived from European law and is also known as 'the e-privacy Directive'.

The e-privacy Directive complements data protection laws and sets out more specific privacy rights on electronic communications. It recognises that widespread public access to digital mobile networks and the internet opens up new possibilities for businesses and users, but also creates new risks to their privacy.

The e-privacy Directive covers marketing by electronic means, including marketing calls, texts, emails and faxes.

The e-privacy directive marketing provisions do not apply to other types of marketing, such as mailshots or online advertising. However, it must still comply with the Data Protection Act.

Under PECR, direct marketing rules apply to electronic communications. Consent is required unless the 'soft opt-in' applies. The DUA 2025 increased penalties for breaches to UK GDPR levels and introduced exemptions for certain non-essential cookies (e.g., statistical or performance cookies). LDWA must maintain clear records of consent and provide easy opt-out options.

- Strider

Members have the right not to receive Strider. Members should contact the membership secretary if they do not have access to the website.

4. Purpose Limitation

Context

This requirement aims to ensure that the LDWA are clear and open about the reasons for obtaining personal data, and that what is done with the data is in line with the reasonable expectations of the data subjects concerned.

The LDWA Commitments

The LDWA will:

- Clearly document within privacy notices the purpose of collecting specified data;
- Not do anything with your data that you would not expect outside of the privacy notices; and
- Only collect and process the personal data that it needs for purposes it has identified in advance in the privacy notices.

Privacy Notices

Privacy notices must be used in all circumstances when the LDWA is collecting personal data from data subjects to meet the lawfulness, fairness and transparency principle.

Consent must be required from parents or guardians to hold data on individuals who are under 16 (unless it is for safeguarding reasons). This includes adding individuals' names to registers. Consent must be required from legal guardians to hold data on individuals who are classed as vulnerable adults (unless it is for safeguarding reasons). This includes adding individuals' names to registers.

Circumstances where personal data is collected include, but is not limited to:

- Applying for membership online

The following privacy notice is used:

I understand that the personal information submitted on this application form will be used to manage my membership and provide me with relevant information about the LDWA. I understand if I become a member, my details will be held within the national membership database and will be shared with my local group to enable local volunteers to contact me.

Please see the Data Protection and Privacy User Guide on www.ldwa.org.uk for more information.

- Challenge Event Registration

This privacy notice must be used for all challenge events including anytime or the annual 100 mile events where personal data is processed. It is the responsibility of the event organiser to ensure the notice is accurate and seen by entrants. For example SiEntries should be updated to reflect this if SiEntries are used to take Challenge Event entries. We also recommend that this is included in the final email sent out to all participants before the start of the event.

I understand that the personal information submitted on this entry form will be held by the event organisers and retained securely for up to seven years after the event is held for the purpose of managing this event only. Any medical data or participant tally lists will be deleted after seven days.

I accept that photographs or videos are likely to be taken at the event, which may be featured in Strider magazine, group newsletters, on LDWA websites and on LDWA social media. I understand this will be held in perpetuity and I have the right to request deletion where it is physically possible for the LDWA to do so.

I understand that my personal data may be published immediately and may be held in perpetuity for the purposes of providing a record of the event. I have the right to request that all my personal data be anonymised or removed where it is possible for the LDWA to do so.

Please see the Data Protection and Privacy User Guide on www.ldwa.org.uk for more information

Event organisers should respect requests to avoid photos or videos. Walkers should not feel excluded—reasonable adjustments must be made.

- Social Walk Registration

This privacy notice must be used for all social walks where personal data is collected. It is the responsibility of the social walk organiser to ensure the notice on social walks registers is correct:

I understand that the personal information submitted for this social walk will be held by the organisers and retained securely on the LDWA website for up to one year after the walk has taken place.

Non-members' contact details may be used to facilitate a follow up to check whether you wish to become a member of the LDWA. If you do not wish to receive such a communication please state so on the form.

I accept that photographs or videos are likely to be taken during the walk, which may be featured in Strider magazine, group newsletters, on LDWA websites and on LDWA social media. I understand this will be held in perpetuity and I have the right to request deletion where it is physically possible for the LDWA to do so.

Please see the Data Protection and Privacy User Guide on www.ldwa.org.uk for more information.

It is important that social walk organisers are flexible with their approach if a walker does not want to be included in photographs and videos. A walker should not feel excluded from a social walk if the walk organiser can make reasonable adjustments to meet their needs.

Case Study:

A walker attending a social walk requested not to appear in any photos. The organiser respected this by ensuring the walker was not included in group shots and by cropping images before posting on social media. This demonstrates how LDWA balances legitimate interests with individual rights.

- Making claims on the Hillwalkers and National Trails Registers

This privacy notice must be used for all Registers where personal data is collected. It is the responsibility of the Register Recorder to ensure the notice on Registers is correct:

I understand that the personal information submitted in this claim will be held and retained securely on the Register in perpetuity unless subsequently amended by me or unless I ask the Recorder to withdraw my name from the Register.

I acknowledge that my walking achievements and personal details will be published on the Register. I will have the right to request the Recorder to remove my name and other personal information from the Register and not feature in future publications

You cannot participate in any of the above activities without consenting to the statements. This allows the LDWA to run activities safely, and meet data protection legislation by setting out the legal reason for using your data.

5. Data Minimisation

Context

The LDWA must identify the minimum amount of personal data needed to fulfil its purpose. The LDWA should hold that much information, but no more.

The LDWA Commitments

The LDWA will ensure data held and used is:

- Adequate and sufficient to properly fulfil its stated purpose;
- Relevant and has a rational link to that purpose; and
- Limited to what is necessary. We will not hold more than is needed for that purpose.

We only collect the data we need for a specific purpose. We review and delete unnecessary data regularly.

6. Data Accuracy

Context

This data protection principle is self-explanatory in that personal data must be accurate and where necessary kept up to date.

The LDWA Commitments

The LDWA will:

- Take all reasonable steps to ensure the personal data held is not incorrect or misleading.
- Keep the personal data updated.
- Take reasonable steps to correct or erase incorrect or misleading data as soon as possible.
- Carefully consider any challenges to the accuracy of personal data.

If your personal details change or if you add new walking achievements, it is your responsibility to inform the Recorder of the Register. Modifications will normally be made within one month of the Recorder being notified of any changes by you. The walking achievements for each named claimant are normally published annually.

The LDWA must ensure that Users' personal information is accurate and up to date. Therefore, Users should advise the LDWA of any changes to their information via the LDWA website or via the membership system held on SiEntries (www.sientries.co.uk). If Users do not have access to the internet, they should contact the Membership Secretary, in which case their details will be amended within one month of receipt of such a request being made.

Local Groups should use the national membership database for all information that they require relating to their Group members. They should not hold separate databases of members.

Case Study

A Local Group requires a report showing how many members reside in each of the postcodes covered by the Group. This report should be requested from the LDWA Data Analyst (dataanalyst@ldwa.org.uk) who will produce it from the LDWA membership database.

The Local Group should not download the data and produce the report locally.

7. Storage Limitation: Data Retention

Context

Deleting or anonymising data when it's no longer needed helps prevent it becoming outdated or excessive.. Apart from helping the LDWA to comply with the data minimisation and accuracy principles, this also reduces the risk that personal data will be used in error – to the detriment of all concerned.

The LDWA Commitments

The LDWA will

- justify how long personal data is retained for. It must periodically review the data it holds, and erase or anonymise it when it is no longer needed.
- carefully consider any challenges to the retention of data. Data subjects have a right to erasure if it is no longer required.

Retention Schedule

The following table sets out where personal data (or a risk assessment) may be collected and how long it is retained for.

Generally, individuals give the LDWA their personal information when they:

1. Ask about our activities;
2. Ask about their membership;
3. Purchase goods from the LDWA;
4. Take part in one of the LDWA's Challenge Events or Social Walks;
5. Claim an entry on the Registers; or
6. Participate in other events, such as the AGM or Group parties.

The table below sets out the data, purpose for collection and retention period. Retention periods are based on legal obligations and best practice. Where data is kept indefinitely (e.g., registers), LDWA offers anonymisation on request.

Data	Purpose	Retention Period(s)
Membership		
Personal Data (including details of members under 18).	Compliance with financial reporting requirements. To manage the Association.	7 years after membership lapses.
Historical Membership Payments. (up to March 2023).	Compliance with financial reporting requirements. (No card or direct debit details or new payment data)	7 years after payment.
Survey response.	To improve the service provided to members.	2 years from receipt.
Challenge Events (including 100's)		
Challenge Event Organiser Contact Details.	To manage the smooth running of a challenge event. For insurance purposes.	7 years after the challenge event ends. In perpetuity if included in Strider.
Participant Contact Details.	To manage the smooth running of a challenge event. For insurance purposes.	7 years after the challenge event ends.
Risk Assessments.	To manage the smooth running of a challenge event. For insurance purposes.	7 years after the challenge event ends.
Medical Data.	To manage the smooth running of a challenge event.	7 days after the challenge event ends.
Participant Tally Lists.	To manage the smooth running of a challenge event.	7 days after the challenge event ends.
Challenge Event reports or photographs in the walks database.	Sharing of event information with the membership.	In perpetuity (Personal data can be anonymised or photos removed on request).

Results of a Challenge Event.	To celebrate and recognise achievements during challenge events.	In perpetuity (Personal data can be anonymised on request).
Social Walks and Other Events		
Social Walk or Event Leader Contact Details.	For the legitimate interests of the LDWA.	1 year following the date of the Social Walk. In perpetuity if included in Strider.
Social Walk and other Event Registers	For the legitimate interests of the LDWA.	1 year following the date of the Social Walk. Walk Coordinator: 1 week following the date of the Social Walk. Walk Leader: 1 week following the date of the Social Walk.
In Case of Emergency Contact Details.	Walk Safety.	End of Social Walk.
Social Walk reports or photographs in the walks database.	Sharing of walk information with the membership.	In perpetuity (Personal data can be anonymised or photos removed on request).
Incidents/Nominations		
Accident & Incident Report	To enable the LDWA to manage future claims.	7 years after the accident or incident is reported.
Grievance	To enable the LDWA to manage future claims.	7 years after the grievance is closed.
Safeguarding Report (relating to a vulnerable adult or under 18)	To enable the LDWA to manage future claims and comply with The Limitation Act 1980.	7 years after the incident is closed.
Nomination for Local Group or National Committee roles.	To manage the smooth running of nominations.	1 year following the election.

LDWA Website		
Web Activity by IP Address.	To manage security of website. To produce anonymised statistics.	3 months
Login Cookies	To allow “remember me” functionality on the website and enable smooth logging into the members area.	LDWA does not store this. The Cookie Expiry time is set 1 year after creation, after which the Users Browser should delete it. The user can also remove it from their machine by unselecting the “remember me” option on the log in/out screen or by manually deleting it.
Material published on the LDWA National or Local Group websites (with or without photographs)	To enable smooth communication and sharing of ideas across the membership.	In perpetuity (Personal data can be anonymised or photos removed on request).
Material sent via bulk emails to members (with or without photographs).	To enable smooth communication and sharing of ideas across the membership.	In perpetuity.
Long Distance Path Database Suppliers and Publications.	To provide value to our members by offering additional services they may benefit from.	In perpetuity.
LDWA Forum – Individual Posts	To enable smooth communication and sharing of ideas across the membership.	In perpetuity.
NEC and Local Group Committee Details.	To enable smooth running of the LDWA and Local Groups.	Until committee position is ended.
Ballots or Elections	To enable smooth running of the LDWA	Until the results are ratified.

Registers		
Hill Walkers	To celebrate and recognise achievements of hill walkers.	In perpetuity (Personal data can be anonymised on request).
National Trail Register	To celebrate and recognise achievements of trail walkers.	In perpetuity (Personal data can be anonymised on request).
England & Wales Coast Path Register	To celebrate and recognise achievements of coast path walkers.	In perpetuity (Personal data can be anonymised on request).
100's Recorder	To celebrate and recognise achievements of 100's entrants.	In perpetuity (Personal data can be anonymised on request).
Payments		
Purchase history in website Shop (no payment details processed by LDWA)	To manage the smooth running of stock and merchandising for members. To comply with financial reporting requirements.	Website orders - 7 years.
Expense Claims	Compliance with financial reporting requirements.	7 years from the expense claim.
Publications		
Articles within the Strider publication	To enable smooth communication and sharing of ideas across the membership.	In perpetuity. As it is printed personal data cannot be removed once published.
Names and Achievements published in the Hillwalkers' Register Annual Publication.	To celebrate and recognise achievements of hill walkers.	In perpetuity. As it is printed personal data cannot be removed once published.
National Executive Committee		
Records of decisions made by the NEC	To comply with the Articles of the Constitution.	At least 10 years.
Local Groups		
Records of decisions made by Local Group Committees	To manage the smooth running of a Local Group and to comply with the Local Group's Constitution.	At least 10 years.

Other		
Email	To enable smooth communication with members. The data will quite often fall under another category and justification.	Up to a maximum of 7 years from receiving the email. But if the content falls under another data category the retention period will be as for that category.
Backups	To enable smooth running of IT systems.	2 Months of top of other retention periods.

8. Integrity and Confidentiality: Data Security

Context

The LDWA must ensure that it has appropriate security measures in place to protect the personal data held.

The LDWA Commitments

The LDWA Will:

- Make all reasonable efforts to protect the privacy of all individual data and to maintain the security of all personal information held by the LDWA centrally and by its Local Groups.
- Provide a secure location for personal data to be retained on the website through its membership database or walk registers.
- Ensure that appropriate security measures are in place on the LDWA website to ensure that personal data can only be accessed by those who need to access it and that it is held securely.
- Provide guidance on security measures to local groups where personal data is not held on the LDWA website.

Third Parties

For our Challenge Events, we often use third parties (SiEntries, for example) to manage the application and to receive the entry charge for the Event. In these circumstances, these third parties are acting as data processors for the LDWA and are committed to keeping the personal information of applicants confidential.

Our printer is given access to names and addresses for the purpose of mailing out Strider and other communications with members. This supplier is subject to a signed contract, which includes provisions to support the LDWA in its commitments to the data protection of its users and to compliance with the Data Protection Act 2018.

Our shop uses Stripe as our payment service provider, who processes personal data on our behalf. This supplier is subject to a signed contract, which includes provisions to support the LDWA in its commitments to the data protection of its users and to compliance with the Data Protection Legislation. Note: the LDWA does not hold details of or process card payments.

We use eTempa to manage the design and development of our website. Although eTempa do not process data on our behalf they will have access to all personal data on our website and membership database. eTempa are subject to a signed contract, which includes provisions to support the LDWA in its commitments to the data protection of its users and to compliance with Data Protection Legislation.

We use SiEntries to manage our membership, including changes to personal details and handling annual subscriptions. LDWA membership data held on this platform complies with LDWA data protection policy and this User Manual. For further information on how SiEntries manage personal data please visit <https://www.sientries.co.uk/privacy.php>

LDWA will only transfer data outside the UK where permitted under UK adequacy regulations or with appropriate safeguards such as International Data Transfer Agreements. Transfers to the EEA remain unrestricted under current adequacy decisions.

Local Group Security

Personal data stored on volunteers' devices is less secure than data on the LDWA website. Should a Local Group collect personal data not retained on the LDWA website, it has the following obligations:

- To comply with the LDWA data retention policy – see section 5.
- To ensure data is kept securely and safely on an electronic storage device that has password-controlled access with internet security systems operating.
- Any personal data on paper must be locked securely away and preferably retained in a secure digital format (see above).
- To restrict access to those that are entitled to it for LDWA purposes only.
- To not share or sell personal data to any third party.
- To comply with any data subject rights as set out in the data protection policy e.g. removing or correcting data. Note: please liaise with the Data Protection Officer to help support any requests.
- To report any loss or compromise of personal data to the Data Protection Officer within 24 hours of an incident.

Case Study:

A Local Group volunteer lost a USB stick containing walk registers. The breach was reported within 24 hours to the Data Protection Officer, who assessed the risk, notified affected individuals, and implemented encryption for future storage. This highlights accountability and compliance with UK GDPR breach notification requirements.

9. Data Accountability

Context

The accountability principle requires the LDWA to take responsibility for what is done with personal data and how it complies with the other principles.

The LDWA must have appropriate measures and records in place to be able to demonstrate compliance. All volunteers at a local or national level who handle personal data on behalf of the LDWA must be aware of their responsibilities under this policy.

Negligently breaching this policy may result in action being taken on the local group or individual concerned. Disclosing personal data in breach of this data protection policy may also be a criminal offence.

The LDWA Commitments

The Directors of the LDWA take ultimate responsibility for Data Protection. The Directors have formally appointed a Board member as its Data Protection Officer.

The LDWA will:

- Adopt and implement a data protection policy that is reviewed regularly.
- Provide further guidance to members and local groups in the forms of this data protection user guide.
- Ensure that written contracts are in place with all organisations that process personal data on our behalf. These third parties are set out in section 8.
- Mandate that all local groups must identify a member of their committee to be the person responsible for ensuring compliance with the Data Protection Policy. This person will have responsibility for managing the personal data of the Local Group's members. In the absence of appointing an individual this role resides with the Chair.

If you have any concerns around adherence to this policy or wish to exercise any of your rights under Data Protection legislation, then you can contact the Data Protection Officer:

Email: dataprotection@ldwa.org.uk

10. Monitoring and review

This User Guide was last updated in November 2025 and is regularly monitored and reviewed.

Appendix A – Definitions

Term	Definition
Adequacy Decision	A decision by the UK government that a country provides sufficient data protection for international transfers.
Age Appropriate Design Code	ICO code setting 15 standards for online services likely accessed by children, ensuring high privacy by default.
Anonymisation	Removing personal identifiers so data can't be linked back to you.
Consent	When you give clear permission for LDWA to use your data for a specific purpose.
Controller (Data Controller)	The organisation that decides how and why your data is used (LDWA in this case).
Data Subject Access Request (DSAR)	A request by an individual to see what personal data an organisation holds about them.
Data Processor	A third party that handles data on behalf of LDWA (e.g., SiEntries).
Data Subject	The person whose data is being collected or used.
Direct Marketing	Sending information to promote LDWA events or services—requires your consent.
DUAA (Data Use and Access Act)	2025 UK law reforming data protection, introducing smart data schemes, digital identity, and clarifying lawful bases.
Lawful Basis	The legal reason for using your data (e.g., consent, contract, legal obligation).
Legitimate Interests	A legal reason to use data for LDWA's core activities, provided it doesn't override your rights.
PECR	Privacy and Electronic Communications Regulations—rules for electronic marketing and cookies.
Personal Data	Any information that can identify a living person (e.g., name, email, phone number).
Retention Period	How long LDWA keeps your data before deleting or anonymising it.
Special Category Data	Sensitive data such as health details, ethnicity, or religious beliefs that require extra protection.
UK GDPR	UK General Data Protection Regulation—rules for handling personal data.
Vital Interests	Using data to protect someone's life or safety in an emergency.