

# Cycle Confident Ltd

## Privacy Policy

Version 2.1 | Effective from 9 September 2026 | Supersedes version 2.0 (4 March 2026)

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### 1. Who We Are

Cycle Confident Ltd delivers cycle training and associated activities to schools, local authorities and organisations across the UK.

For the purposes of the UK General Data Protection Regulation (UK GDPR), Cycle Confident Ltd is a Data Controller in respect of certain personal data and, in some circumstances, a Joint Controller alongside the commissioning school or organisation.

- **Registered company name:** Cycle Confident Limited
- **Registered company number:** 06944710
- **Registered address:** The Old Vicarage, Valley End Road, Chobham, Woking, GU24 8TB
- **Data protection contact:** [privacy@cycleconfident.com](mailto:privacy@cycleconfident.com)
- **Data protection lead:** David Showell, Director

This policy is published at [www.cycleconfident.com/privacy](http://www.cycleconfident.com/privacy) and the current version is always available there.

### 2. When We Act as Joint Controllers

Where a school or organisation engages Cycle Confident Ltd to deliver training, both the School and Cycle Confident Ltd determine the purposes and means of processing children's data for:

- Delivery of cycle training
- Safeguarding compliance
- Incident investigation
- Programme administration
- Reporting to commissioning bodies
- Quality assurance and evaluation

In these circumstances, we act as Joint Controllers under Article 26 UK GDPR. The essence of this arrangement is set out in our Joint Controller Data Protection Schedule (Article 26 UK GDPR), published on our website.

Schools agree to this arrangement as part of booking our services.

### 3. When We Act as an Independent Controller

Cycle Confident Ltd acts as an independent Data Controller where processing relates to:

- Safeguarding referrals or serious incident records
- Legal compliance and regulatory reporting
- Insurance and legal defence purposes
- Direct communications with schools or commissioners
- Recruitment and employment of staff
- Website enquiries and direct adult course bookings

In these circumstances, Cycle Confident Ltd independently determines the purposes and means of processing.

### 4. What Personal Data We Process

Depending on the service delivered, this may include:

### For children

- Name
- Date of birth / age / school year
- Gender / ethnicity (where required for reporting)
- Emergency contact information
- Medical or health information relevant to participation
- Special educational needs (SEN) information
- Attendance and assessment outcomes
- Incident and safeguarding records

| *Medical and SEN information constitutes Special Category Data under Article 9 UK GDPR.*

### For parents / guardians

- Name
- Contact details
- Emergency contact details

### For school staff

- Name and role
- Contact details

### For adults booking directly

- Name
- Contact details
- Postcode, where required to confirm eligibility for a funded course
- Any accessibility requirement relevant to safe participation

## 5. Lawful Basis for Processing

Processing is carried out under:

- **Article 6(1)(e) – Public Task** — where training is commissioned by a local authority or delivered through a school acting as a public authority.
- **Article 6(1)(b) – Contract** — where an individual books a course directly with us.
- **Article 6(1)(f) – Legitimate Interests** — where processing is necessary to deliver a service the individual has requested, or to administer and evaluate our programmes.
- **Article 9(2)(g) – Substantial Public Interest** — for special category data processed for safeguarding purposes.

We do not rely on consent as the lawful basis for delivering training. Consent is used only for marketing communications, as set out in section 8.

Schools remain responsible for ensuring they have a lawful basis to share data with us. Where required, parental information is provided by the School.

## 6. Why We Process Data

We process personal data to:

- Deliver cycle training safely
- Assess participant competence
- Manage health and safety
- Comply with safeguarding obligations
- Maintain accurate attendance records
- Meet commissioning and funding requirements

- Provide aggregated reporting under national assurance frameworks
- Defend legal claims or insurance matters

**We do not use children's data for marketing purposes.**

## 7. Bikeability and National Reporting

Where training is delivered under national cycle training standards, participation and outcome data may be processed for:

- Audit and verification
- Quality assurance
- Funding compliance
- National performance reporting

This processing is undertaken in line with national delivery and assurance requirements and is covered within our Joint Controller arrangement. Data shared for reporting purposes is limited to what is necessary, and is aggregated or anonymised wherever the reporting purpose allows.

## 8. Marketing Communications

Marketing is kept entirely separate from the delivery of training and is based on consent.

- Adults booking directly with us are offered an explicit, unticked opt-in at the point of booking to receive information about follow-on courses, Dr Bike sessions and similar activity. Booking is never conditional on opting in.
- The opt-in, together with the date and time it was given, is recorded against the individual's record, so evidence of consent is retained and auditable.
- Consent can be withdrawn at any time using the unsubscribe link in every marketing email, or by emailing [privacy@cycleconfident.com](mailto:privacy@cycleconfident.com). Withdrawal is actioned on receipt and the change is logged.
- We do not use children's data for marketing under any circumstances, and we do not market to parents or guardians on the basis of a child's booking.

## 9. Where Your Data Is Stored

Our booking platform is hosted on Railway, deployed in its EU West region in Amsterdam, the Netherlands. No personal data is stored outside the European Economic Area.

- The Netherlands is an EEA member state with full adequacy under the UK adequacy regulations. A transfer of personal data from the UK to the Netherlands is therefore not a restricted transfer under the UK GDPR, and no International Data Transfer Agreement or UK Addendum is required for the storage and processing itself.
- Our hosting provider acts as our processor under a Data Processing Addendum which incorporates the EU Standard Contractual Clauses and the UK Addendum, covering any transfer outside the UK or EEA — for example, technical support access.
- Our hosting provider maintains a published subprocessor list and gives advance notice of any change, giving us the opportunity to object.

## 10. Data Retention

We retain data only for as long as necessary:

- **Programme records** (booking, attendance and assessment outcome): minimum 3 years, for audit and funding assurance.
- **Safeguarding and serious incident records:** potentially up to 21 years from the date of the incident, reflecting the legal limitation periods that apply where minors are involved.
- **Insurance and legal defence records:** in accordance with statutory limitation periods.

Retention is reviewed annually. The review identifies records that have passed their retention period, and those records are securely deleted or anonymised, with the outcome recorded in a deletion log. Individual erasure requests are actioned on receipt rather than held to the annual cycle.

Electronic records are securely erased to NIST 800-88 or an equivalent standard. Backups are taken daily on a rolling cycle and overwritten in the normal course, so deleted records fall out of the backup set within that cycle. Any physical records are destroyed by certified shredding.

## 11. Security Measures

Cycle Confident Ltd maintains appropriate technical and organisational security measures including:

- Secure data transfer, encrypted in transit using TLS 1.2 or higher
- Role-based access controls, so staff and instructors see only the information their role requires
- Multi-factor authentication on administrative accounts
- Encryption where appropriate
- DBS-checked staff
- Data protection and safeguarding training
- Secure storage systems

We do not transfer personal data by unencrypted email or unsecured physical media.

We operate a formal incident response process in line with Article 33 UK GDPR. All incidents are escalated immediately to our data protection lead, logged and assessed for severity, and where the threshold is met reported to the Information Commissioner's Office and to affected individuals within 72 hours. Where a Joint Controller arrangement applies, we notify the School or commissioning body without undue delay and co-operate on assessment and communications.

## 12. Your Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion, subject to safeguarding or legal obligations
- Restrict processing
- Object to processing, where the lawful basis allows
- Withdraw consent to marketing at any time
- Data portability, where processing is based on consent or contract and carried out by automated means

Requests should be directed to [privacy@cycleconfident.com](mailto:privacy@cycleconfident.com) and will be responded to within one month.

Where processing is carried out under a Joint Controller arrangement, we may liaise with the School to respond appropriately. The School will normally act as the primary contact for parents and guardians unless otherwise agreed.

## 13. Complaints

If you are unhappy with how we process personal data, please contact us in the first instance at [privacy@cycleconfident.com](mailto:privacy@cycleconfident.com).

You also have the right to complain to the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk).

## 14. Updates

We may update this Privacy Policy from time to time. The latest version will always be available at [www.cycleconfident.com/privacy](http://www.cycleconfident.com/privacy).

## Version History

| Version | Effective        | Summary of change                                                                                                                                                                                                                                           |
|---------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.0     | —                | Original policy.                                                                                                                                                                                                                                            |
| 2.0     | 4 March 2026     | Joint Controller arrangement introduced under Article 26 UK GDPR. Retention periods formalised.                                                                                                                                                             |
| 2.1     | 9 September 2026 | Company registration details added. Marketing consent section added. Hosting and international transfer section added following migration to EU-hosted infrastructure. Retention review cycle and deletion process documented. Section numbering corrected. |