Privacy Policy – Ultra Challenge Ltd

Last updated on 13 February 2026

This is the privacy policy (the "Privacy Policy") of **Ultra Challenge Ltd** ("we", "us" or "our") – Company Number: 03825838 – Registered Office: Ultra Challenge Ltd, Wellesley House, Duke of Wellington Avenue, London, SE18 6S6.

We are committed to protecting your personal data and complying with all data protection legislation, and this Privacy Policy sets out how we collect, process, and look after your personal data when you interact with us.

IT IS IMPORTANT THAT YOU READ THIS PRIVACY POLICY

1. DATA CONTROLLER:
Ultra Challenge Ltd is the Data Controller, and we have a Data Protection Officer who is responsible for overseeing our Privacy Policy. If you have any question, including any requests to exercise your legal rights, please contact us at:

privacy@ultrachallenge.com ***Phone*:** 0207 609 6695**, *Mail*:** Ultra Challenge Ltd, Wellesley House, Duke of Wellington Avenue, London, SE18 6S6

You have the right to make a formal complaint to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk) – however we would really appreciate the opportunity to deal with your concerns first.

It is important that the personal data we hold about you is accurate and current, so please keep us informed if personal data changes

2. THIRD-PARTY LINKS
Our websites and mobile APP may include links to third-party websites, plug-ins and applications (eg Social Media / charity websites) which may allow data to be collected about you. We are not responsible for their privacy policies.

3. OUR ELECTRONIC REGISTRATION FORMS & ACTIVE NETWORK LLC
The online registration system that we currently use for Participants to sign up to some of our events (Ultra Challenge events), and pay a registration fee or deposit, is owned and operated by a specialist third party organisation called **ACTIVE NETWORK LLC** ("Active") – who are a USA company, and act as a **separate Data Controller** in respect of personal data comprised in the Personal Information section of the online registration forms. You can find out more about Active **HERE >>**, and by utilising their systems to sign up to one of our events you will be agreeing to, and subject to Active's 'Terms of Use' and their own 'Privacy Policy' .

4. THE DATA WE COLLECT ABOUT YOU
Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

"Identity Data" includes first name, surname, username or similar identifier, title, date of birth, photographs, bib number, age, gender, qualifications and insurance details.

"Contact Data" includes billing address, residential address, delivery address, email address, telephone numbers. Social media ID's, and emergency contact details

"Financial Data" payment card details and bank account details in some instances

"Transaction Data" includes details about payments to and from you and products / services you have purchased from us.

"Technical Data" includes internet protocol (IP) address, your login data

"Profile Data" includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, performance, results and times at our events

"Additional Marketing and Communications Data" includes your preferences in receiving marketing from us

We also collect, and use Aggregated such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as it does not directly or indirectly reveal your identity.

We may also collect personal data that includes “Sensitive” or “Special Categories” of personal data, such as: dietary requirements, details about your race or ethnicity, information about your health, and certain medical information (which is only ever used to look after your ‘best interests’ whilst taking part within one of our events)

5. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract that we have with you surrounding one of our Events and you fail to provide that data when requested - we may not be able to perform the contract for you to join that Event. We will notify you if this is the case at the time.

6. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions - You may give us your Identity Data, Contact Data and Financial Data by filling in forms or by corresponding by post, phone, and email or otherwise. This includes personal data you provide when you:

- Visit one of our websites
- Sign up to one of our Events or Challenges
- Provide additional pre-Event information
- Take part within one of our Events as a participant and customer
- Work or volunteer on one of our Events
- Utilise our mobile App
- Communicate with us via email or via other electronic means
- enter a competition, promotion or survey;
- give some feedback;

Automated interactions - As you interact with our websites and our mobile APP, we may collect Data about your equipment, and browsing actions.

7. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Generally we will use your personal data:

-Where we need to perform the contract that we are about to enter into or have entered into with you.
- Where it is necessary for our Legitimate Interests, and your interests as a customer of us, and fundamental rights do not override those interests.
- Where we need to Comply with a Legal or Regulatory Obligation.
- Where we are looking after your best interest and personal welfare (ie medical type matters and data)
- Where you have given us Consent to use components of your personal data

Generally, We do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing information sent by us to you beyond 3 years after you have signed up to take part in an Event with us, and for any third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time.

8. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Set out below is a summary of the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate and the period for which we retain your personal data.

> **Note** - We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest	Retention period (not exceeding)
To apply to participate, or to participate, or to organise a team, in any of our events	(a) Identity Data (b) Contact Data (c) Transaction Data (d) Technical Data (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a Contract with you (b) Legitimate Interests (We need this data to be able to allow you to participate in our events.	5 years from last application to participate
To facilitate and publish the results of our events	(a) Identity Data (b) Profile Data	(a) Legitimate Interests (we need the ability to publish and store the challenge results after the Specific Event and keep a historic log of this data all for the purpose of staging the event(s) and for archival and historic research.	10 years
To film and/or otherwise record our events and to take photographs and record footage of our events	(a) Identity Data	(a) Legitimate Interests (we need the ability to publish, display, sell and distribute our events)	In perpetuity
To invite you to participate, and for you to participate, in our hospitality & to join other similar Events.	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Performance of a Contract with you. (b) Legitimate Interests (we need this data to be able to give you the option to attend, and to provide you with, good hospitality and special deals as a valued customer).	3 years since the last time that you signed up to take part within one of our Events.
To register you as a new customer (not otherwise dealt with in this table)	(a) Identity Data (b) Contact Data	(a) Performance of a Contract with you (b) Legitimate Interests (to provide you with customer services).	3 years from last registration as a customer or last interaction with Us as a customer, whichever is later
To process and deliver your order including: (a) Manage payments, fees and charges; and (b) Collect and recover money owed to us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (to recover debts due to Us) (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax and consumer protection purposes).	3 years from order completion
To manage Our relationship with you which will include: (a) Notifying you about changes to Our terms or Privacy Policy (b) Asking you to leave a review or take a survey (c) dealing with any complaints and responding to feedback	(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary to Comply with a Legal or Regulatory Obligation (c) Necessary for Our Legitimate Interests (to keep our records updated and to study how customers use our products/services)	5 years from last correspondence

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (to study how customers use our products/services, to develop them and grow our business)	3 years from prize draw, competition or survey
To use data analytics to improve the Site and Our products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	(a) Necessary for Our Legitimate Interests (to define types of customers for Our products and services, to keep the Site updated and relevant, to develop Our business and to inform Our marketing strategy)	3 years from collection of data
To make suggestions and recommendations to you about Events or services that may be of interest to you.	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	(a) Necessary for Our Legitimate Interests (to develop our products/services and grow our business and to provide you with the opportunity tojpin our Events.	3 years from last unsuccessful ballot application or 3 years from last participation in one of Our events, whichever is later
For event logistics and operational purposes (including emergency service access routes, personal care plans and public access routes)	(a) Identity Data (b) Contact Data	(a) Necessary for Our Legitimate Interests (for ensuring that the event logistics are in place to ensure successful staging of Our events) (b) Necessary to Comply with a Legal or Regulatory Obligation (safety and security and insurance)	3 years from the event to which the data relates

9. MARKETING

We will get your express opt-in consent before we share your personal data with any company outside Action Challenge for marketing purposes, unless that company is the 'successor' to Action Challenge in operating the Events to which your applicable Personal Data may be associated with. You can ask us or third parties to stop sending you marketing messages at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided as a result of product/service/event purchases or experiences.

10. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly.

11. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If We need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

12. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out in the table above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If the ownership of any of our Events passes to a 3rd party organisation or company, we reserve the right to transfer all your Personal Data applicable to that Event to that 3rd party to enable them to continue to operate the Events, to comply with any regulatory requirements, and to market the Event to customers who have taken part in an Event or a similar styled event, or who have specifically expressed an interest in receiving marketing type information on Action Challenge's events. Data transferred to a 3rd party under these circumstances would be on the basis as set out within this Privacy Policy – and if the 3rd Party choose to amend the Privacy terms, they

would be required to disclose that information to you.

13. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Such destinations may not have laws which protect your information to the same extent as in the EEA. Whenever we transfer your personal data out of the EEA, We ensure a similar degree of protection is afforded.

14. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

15. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes that we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

16. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

a) Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it.
b) Request correction of the personal data that We hold about you. This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.
c) Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
d) Object to processing of your personal data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if We no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but We need to verify whether we have overriding legitimate grounds to use it.
f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above – please contact us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, We will notify you and keep you updated.