



# Privacy Policy

## Introduction

Exped Manager is an application developed using Zoho's APIs that is posted on Zoho's online marketplace. Aspen Outdoors Ltd is the application developer of Exped Manager. When you install Exped Manager, you can opt to share your name and email address with Aspen Outdoors Ltd. The purpose of sharing this information is so that we may engage with you directly as the provider of that application. This policy pertains to the control of this personal information. The policy also extends to other information provided by customers of Exped Manager, through email communication, feedback and testimonials.

## Aspen Outdoors Ltd

Aspen Outdoors Ltd is an outdoor activity business and provider of software for expedition services. It is a registered Scottish Limited company: SC546890.

The address and contact details of the company are as follows:

Alastair Ewen, Director, [alastair@aspenunddoors.co.uk](mailto:alastair@aspenunddoors.co.uk), 07427326697  
Flat ½ 9 Thornwood Drive, Partick, Glasgow, G11 7TS  
<https://aspenunddoors.co.uk/>

## Definitions

The data subject are customers of Exped Manager, whose personal data Aspen Outdoors Ltd holds. The data controller and processor is Aspen Outdoors. A data controller determines the purposes and means of processing personal data. A processor is responsible for processing personal data on behalf of a controller. Personal data is information that relates directly to a data subject: like their name, address, phone number, email address, credit card number, etc.

Data subjects rights under GDPR are:

- The right to be informed

Aspen Outdoors Ltd, SC546890  
Flat ½ 9 Thornwood Drive, Partick, Glasgow, G11 7TS  
07427326697, [alastair@aspenunddoors.co.uk](mailto:alastair@aspenunddoors.co.uk)



- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights related to automated decision making and profiling

## Principles

In relation to personal data Aspen Outdoors Ltd shall be compliant with the following principles:

1. Your data shall always be processed lawfully, fairly and in a transparent manner.
2. Your data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Personal data collected and held shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Personal data shall be accurate and kept up to date; every reasonable step being taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
5. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods.
6. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## Legal Obligation

In respect to principle number 1 above -*Your data shall always be processed lawfully* - the legal basis on which data is held is the consent conferred by customers, through Zoho, to enter into a contract with Zoho and the Marketplace developer (Aspen Outdoors Ltd) to purchase and download Exped Manager.



## Purpose Limitation

In respect to the principles above the purpose to which personal data shall be collected, held, maintained and process shall be as follows:

- For the purpose of communicating with customers in the furtherance of providing support and assistance in the effective operation of Exped Manager.

From time to time customers may be asked whether they give their consent for the following additional purpose:

- To share feedback and / or testimonial information about Exped Manager which shall be published on the company's website.

There may be circumstances in which Aspen Outdoors Ltd seeks to change or add a new legal purpose. In this eventuality Aspen Outdoors Ltd shall seek the additional consent of customers.

Note that Aspen Outdoors Ltd is also a provider of outdoor activity services; e.g. guiding, Duke of Edinburgh's Award expedition services. In circumstances where a customer of Exped Manager may make an enquiry about or enters into a contract with Aspen Outdoors Ltd for an outdoor activity service, this shall be regarded as separate consent and legal purpose; namely, for the provision of outdoor activity services.

## Review of Policy

This policy shall be subject to review from time to time by Directors of Aspen Outdoors Ltd. In circumstances where the review leads to a new or changed legal purpose the consent of customers shall be sought. The policy shall be publically available on the [company website](#).