



D-Day Leadership Academy (DLA)

The Normandy Passage — GDPR Data Protection Notice (Privacy Notice)

Motto: Reverence. Fortitude. Virtue.

Effective date: 18Dec2025 • **Version:** 1.0

1) Who we are (Controller)

Controller: D-Day Leadership Academy (“DLA”), operating The Normandy Passage.

Registered/Postal Address: 5856 S Lowell Blvd. #271 Littleton, CO 80123

Email (privacy): privacy@ddayleadershipacademy.org

EU Representative (Art. 27): **[To be appointed]** — contact details will be published here before EU-based processing begins.

Data Protection Point of Contact: **[Name/role]**, reachable at the privacy email above.

2) Whose data we process

- **Participants** (youth 14–24 with parent/guardian; adult Solo/Committed pairs 18+)
- **Parents/guardians** of youth participants
- **Emergency contacts** designated by participants
- **Cadre/contractors** (limited data for vetting and operations)

3) What we collect (categories of personal data)

- **Identity & contact:** name, DOB/age band, postal address, email, phone, nationality/passport details where needed for travel checks.

- **Program admin:** cohort selection, payment status (no full card data stored by DLA), travel arrival info, rooming/pairing preferences, watch roster.
- **Fitness & medical (special category):** disclosed medical conditions, allergies, medications, relevant history, fitness attestations, injury/incident records.
- **Safeguarding & conduct:** incident logs, watch logs, discipline notes (binary/brief), consent forms, signatures.
- **Media preferences:** consent/opt-out choices (actual images governed by a **separate Media & Likeness Consent**).
- **Technology:** basic system metadata (email headers, file timestamps); we do not profile or conduct automated decision-making.

4) Why we process data (purposes) and lawful bases

We process only what is necessary for the Program, with reverence for the ground and respect for your rights.

Contract (Art. 6(1)(b)) – to enroll and deliver the Program

- Registrations, payments logistics, cohort communications, site scheduling, kit issue/return, watch rosters, late-arrival intake.

Legitimate interests (Art. 6(1)(f)) – safety, integrity, and program administration

- Site etiquette enforcement, safeguarding logs, access controls, loss-prevention for loaner kit, post-course communications (non-marketing operations).
- We apply the balancing test and minimize data where possible.

Legal obligation (Art. 6(1)(c))

- Tax/financial record-keeping, incident reporting where required, insurance notifications.

Vital interests (Art. 6(1)(d))

- Emergency first aid, contacting emergency services/contacts, urgent disclosures to protect life/health.

Consent (Art. 6(1)(a)) – used sparingly

- Optional items (e.g., certain health details beyond necessity, specific communications). You may withdraw consent at any time without affecting prior lawful processing.

Special-category (health) data (Art. 9)

- **Art. 9(2)(a) consent** for disclosed medical details needed to tailor safety measures;

- **Art. 9(2)(c) vital interests** where consent cannot be obtained in an emergency.

5) Where we get data

- Directly from you (forms, emails, calls)
- From a **parent/guardian** (for youth)
- From **emergency contacts** you nominate
- From cadre/staff in the course of safety and safeguarding operations

6) Who receives data (disclosures)

- **DLA staff and vetted cadre/contractors** on a need-to-know basis
- **Medical providers/EMS** in emergencies
- **Insurers/brokers** for coverage or incident handling
- **Travel/logistics vendors** (e.g., van rental, lodging) with minimal necessary details
- **Authorities/regulators** when legally required

We do **not** sell your personal data.

7) International transfers (EU → US and other)

DLA is US-based. When EU personal data is transferred to the US or other third countries, we use appropriate safeguards:

- **EU Standard Contractual Clauses (SCCs)** with US service providers/affiliates; and
- **Derogations** (Art. 49) where strictly necessary (e.g., urgent medical transfer) and proportionate.

Copies or information on safeguards are available via the privacy contact.

8) How long we keep data (retention)

- **Enrollment & operational records: 3 years** after the cohort ends (claims window + operational needs).
- **Financial/tax records: 7 years** (or as required by law).
- **Medical/safeguarding incident files: 7 years** from incident (longer if mandated by insurer/law).
- **Routine communications: up to 2 years** from last contact.

- **Media consents/preferences:** retained until **withdrawal** or end of use case, whichever is sooner.

We delete or securely anonymize after expiry.

9) Your rights (EU/UK GDPR)

Subject to conditions and local law, you may **access, rectify, erase, restrict, or object** to processing, and request **data portability**. Where we rely on consent, you may **withdraw** it at any time.

To exercise rights, contact us at **privacy@ddayleadershipacademy.org**. We will respond within one month (extendable by two months for complexity).

10) Complaints

You may complain to your local supervisory authority. For France, contact the **CNIL** (www.cnil.fr). We welcome the chance to address concerns first via the privacy contact.

11) Children's data & safeguarding

For participants under 18, a parent/guardian must provide required consents and be reachable during field hours. Two-deep adult rule applies. We collect only what is necessary for safety and delivery of the Program.

12) Security

We enforce role-based access, least-privilege, secure storage, encryption in transit, and staff/cadre confidentiality commitments. Incident response procedures are maintained; we will notify authorities and affected individuals of qualifying breaches.

13) Changes to this Notice

We may update this Notice to reflect law or operations. Material changes will be communicated; prior versions are available on request.

14) Contact

Controller: D-Day Leadership Academy (DLA) — Privacy

Email: privacy@ddayleadershipacademy.org

Postal: 5856 S Lowell Blvd. #271 Littleton, CO 80123

EU Representative: **[To be appointed]** — details to be published here.

15) Legal references (GDPR)

This Notice is intended to satisfy transparency duties under **Regulation (EU) 2016/679 (GDPR)**.

Lawful bases: Art. 6(1)(b) (contract), 6(1)(f) (legitimate interests), 6(1)(c) (legal obligation), 6(1)(d) (vital interests).

Special-category data: Art. 9(2)(a) (explicit consent), 9(2)(c) (vital interests).

Transparency & rights: Arts. 12–14, 15–22.

Security & breaches: Art. 32, Arts. 33–34.

International transfers: Arts. 44–49 (incl. Art. 46 SCCs; limited Art. 49 derogations).

EU representative: Art. 27 **(to be appointed)**.