

# Privacy Policy

## 1. Introduction

We process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law (GDPR May 2018).

We value and respect the trust our customers and visitors place in us when they provide access to their Personal Information. This notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

By using the Site or providing information to us you will have accepted the Privacy Policy in force at the time of use. This Privacy Policy was last updated 21<sup>st</sup> May 2018. We may amend this Privacy Policy at any time

## 2. Website links

This Privacy Policy does not cover the data collection practices of any third party, including any third-party operators of web pages to which may link to our Site. Accessing any links may cause you to leave our Site and may result in the collection or sharing of information about you by a third-party (also see Cookies policy).

We do not control, endorse or make any representations about third-party websites or their privacy practices, which may differ from ours. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal data.

## 3. Information Collected

We process personal data in accordance with the law and as far as is reasonably possible in a transparent and fair manner. Our data processing activities are conducted:

- 1) with your consent;
- 2) in order to fulfil our obligations to you;
- 3) for the legitimate purposes of operating our business, or
- 4) otherwise in accordance with law.

As part of the standard operation of the Site, information from your computer or mobile device, including, but not limited to, your browser type, operating system, IP address and the domain name from which you accessed the Site may automatically be collected and stored by the equipment of third parties that we have a relationship with for that purpose.

The personal data that we collect may include: -

- Name
- Date of Birth
- National Insurance Number
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Work Telephone Number
- Mobile Telephone Number
- Financial Information including credit card details.
- Food preferences and allergies and health conditions (spa).

#### **4. Uses and Disclosures of Information**

We will only share your personal data as follows:

##### Sharing with service providers

We may retain service providers to manage or support certain aspects of our business operations on our behalf. These service providers may be located in the UK or in other global locations and may provide services such as credit card processing and fraud management services, credit reference agencies, email service providers, third party booking sites, data hosting, management or support of our site.

Our service providers are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by us.

##### Compliance with law

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorised information requests of law enforcement agencies, regulators, courts and other public authorities. (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect our rights or (v) protect the rights or personal safety of our employees, and third parties on or using our property when allowed.

## **5. Opting out**

If you have the option of subscribing to communications from us related to our products or services. You can make or change your choices about receiving either subscription or general communications from us regarding these services by taking action as described in the communication.

These options do not apply to communications primarily for the purpose of administering advice, contracts, support, or other administrative and transactional notices where the primary purpose of these communications is **not** promotional in nature.

### Consequences of Not Providing Your Data

You are not obligated to provide your personal information to us, however, if this information is required for us to provide you with our services, we will not be able to offer some/all of our services without it.

## **6. Security**

We use reasonable security measures to help protect against the loss, misuse and alteration of the Personal Information under our control. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

In addition, please note that emails, messages sent via your web browser, and other similar means of communication with other users, are not encrypted. We strongly advise you not to communicate any confidential or sensitive information through these means. Therefore, while we strive to protect your information, we cannot guarantee its security.

Please also be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that may be non-negotiable; these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures.

However, we will not be liable (to the fullest extent permitted by law) for any damages that may result from the misuse of any information, including Personal Information, by these companies.

## **7. Cookies**

This Site, like most websites, works best when allowed to use cookies.

A cookie consists of a piece of text sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website; and other uses. We will use the persistent cookies to: enable our website to recognise you when you visit; and other uses.

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites, including this one.

## **8. CCTV Monitoring**

The Company may operate CCTV surveillance systems (“the system”) at its premises, with images being monitored and recorded centrally.

The purpose for processing personal data through use of the system is crime prevention and/or our employee’s safety/security. This is further defined as: CCTV is used for maintaining public safety, the security of property and premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about staff, customers and suppliers (or their agents), offenders and suspected offenders and those inside, entering or in the immediate vicinity of the area under surveillance.

Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, court or tribunal, security organisations and persons making an enquiry.

## **9. Recruitment**

We do not accept speculative CV’s. If you use our Site for the purposes of finding work or send us your CV in response to an advertised job you are providing consent for us to use the your personal data for the purposes of our recruitment processes. Any CV received by the Company from an unsuccessful applicant will be deleted/destroyed 12 months from the date of receipt.

## **10. Your Rights.**

You have the right to access any personal information that we process about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

## **11. Retention of Data**

We only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your purchase information (invoices), basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## **12. Further information**

We only process your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information please contact the General Manager. Alternatively you have the right to lodge a complaint with the supervisory authority.

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Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

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