

## **Privacy policy**

This privacy policy sets out how uses and protects any information that you give Hatton & Harding when you use this website. Hatton & Harding is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement. Hatton & Harding may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

### **1. Who we are**

This website ("https://www.hattonandharding.com") is a company registered in England and Wales under registration number Company number **07289521** ("**Hatton & Harding**," "**we**," "**us**" and/or "**our**"). Our registered address is 1623 Warwick Rd, Knowle, Solihull B93 9LF. You can contact us as indicated under the "Contact" section below.

### **2. What is this privacy policy for**

This privacy policy ("**Privacy Policy**") applies to personal data that we collect from you as a user of this Site or as a customer ("**you**" or "**your**" being interpreted accordingly). It provides information on what personal data we collect, why we collect the personal data, how it is used and the lawful basis on which your personal data is processed, and what your rights are under the applicable data protection and privacy laws, including the General Data Protection Regulation ("**GDPR**") which will become applicable to us and you as of 3rd Feb 2021

'Personal data' as used in this Privacy Policy means any information that relates to you from which you can be identified.

By using our Site or submitting your personal data you are taken to accept the terms of this Privacy Policy, so please read it carefully.

### **3. Personal data we collect**

We collect the following personal data about you:

- **Processing your order:** The personal details you provide when submitting an order. This includes your name, address, e-mail address; business address and phone number; gender and date of birth and country. We also collect information about your debit/credit card and bank account information provided by you to our payment service providers, that we require for the purpose of recording and processing order.

For further details please also refer to the section below headed Payment Information.

- **Other Information:** Personal details you choose to give when corresponding with us by phone or e-mail, participating in user/customer/member surveys or otherwise visiting and interacting with this Site or any other websites we operate, and personal data that you provide to us when you visit one of our clubs or other premises. We can also combine personal data that you provide to us with other information we collect about you when you make a reservation through third-party services such as online spa-reservations, as necessary to process your requests.

#### **4. Automatically collected personal data**

- **Log Data:** When you visit our Site, our servers record information ("log data"), including information that your browser automatically sends whenever you visit the Site. This log data includes your Internet Protocol ("IP") address (from which we understand the country you are connecting from at the time you visit the Site), browser type and settings, the date and time of your request.
- Our Site uses cookies (small text files placed on your device) and similar technologies to distinguish you from other users. This is to provide you with a good user experience when you browse our Site and allows us to improve its features. For detailed information on the cookies and similar technologies we use, please see our cookie policy.

#### **5. How we use your personal data**

We use your personal data in the following ways:

- To acknowledge, confirm and deal with your order. Such use of your data is necessary in order to implement your request.
- Where you are a customer, provide you with customer services, administer your customer account and contact you regarding your use of the services. Such use is necessary to respond to or implement your request and for the performance of the contract between you and us.
- To contact you in connection with user/customer/member surveys and use any information you choose to submit in response, provided that you gave us your consent to being contacted in this way at the time you provided us with the personal data.

#### **6. Payment Information**

Any credit/debit card payments and other payments you make through our Site will be processed by our third-party payment providers and the payment data you submit will be securely stored and encrypted by our payment service providers using up to date industry standards. Please note that we do not ourselves directly process or store the debit/credit card data that you submit.

We may arrange that card or payment data you submit in support of a order is stored for the purpose of processing your order.

## **7. Your personal data protection rights**

Certain applicable data protection laws give you specific rights in relation to your personal data. In particular, if the processing of your personal data is subject to the GDPR, you have the following rights in relation to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details such as the purpose of the data processing. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we would tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your personal data, such as where our legal basis for the processing is your consent and you withdraw consent. If we shared your data with others, we would tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data with so you can contact them directly. We may continue processing personal data where this is necessary for a legitimate interest in doing so, as described in this Privacy Policy.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the personal data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your personal data with others, we would tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

- **Right to data portability:** You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will provide you with your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your personal data, and we will do so:
  - If we are relying on a legitimate interest to process your personal data -- unless we demonstrate compelling legitimate grounds for the processing or
  - If we are processing your personal data for direct marketing.
- **Right to withdraw consent:** If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the UK data protection authority (the Information Commissioner's Office or ICO), or, as the case may be, any other competent data protection authority of an EU member state that is authorised to hear those concerns (you may find EU Data Protection Authorities' contact information)

## 8. Changes to our privacy policy

- Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or modifications. If required by the applicable law, we will notify you of any material or substantive changes to this Privacy Policy.

## 9. Contact

- Questions, comments or requests regarding this Privacy Policy should be addressed to [info@hattonandharding.com](mailto:info@hattonandharding.com)