

# Machynys Golf Club & Premier Spa Privacy Policy

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Licensed July 2019 – June 2022

This privacy policy applies between Machynys Golf Club & Premier Spa, the user of the website and or services provided by Machynys Golf Club & Premier Spa.

Machynys Golf Club & Premier Spa takes their customer privacy very seriously. This privacy policy sets out to help you understand how we collect, collate, process, share and destroy your data.

Machynys Golf Club & Premier Spa identify as the sole data controller.

## What data do we collect?

In order to provide the best service to our customers, we will collect information to provide you with a service and or goods, receipts, order updates or to provide you with promotional offers.

We will collect, name, address, email address, telephone number and bank details.

## Why do you collect this data?

These details are taken to provide you with service or goods and an excellent standard of service however you may opt out of this service at anytime (this will not affect your statutory rights). If you have opted in, you may receive promotional offers from us via text or email. Please note you have the right to unsubscribe at any time.

## Third Party Information

Machynys Golf Club & Premier Spa may from time to time employ the services of other third parties for dealing with certain processes necessary for the terms of the business, and may use in accordance with the law for marketing purposes to advertise promotional offers with legitimate interests only. This will not defer from G.D.P.R Compliance and distribute personal information. We will include anyone who provides services or functions on our behalf, including credit card processing, business analytics, advertising, administration of competitions and promotions, collection of customer feedback and customer service. We use these service providers to process your data on our behalf, this may be to send our marketing material or to collate information that can be analysed anonymously to improve our service. They have access to and may collect information only as needed to perform their functions and are not permitted to share or use information for any other purpose. Where we provide data to third party service providers for them to provide data analysis or statistical services for us, we will only ever send them aggregated, anonymously data. The third-party providers will not share or pass on or even hold your data for longer than necessary to complete the data field transaction to ourselves.

## Controlling Use of Your Data

Where possible we are required to give you the option to restrict use of your data. This is set out in the terms of use of the Data Protection Policy supplied by Logic Document Limited. This will reduce the risk of a data breach for marketing purposes and sharing with third parties.

## How and where will your data be processed?

Any information that we hold about you is stored on our secure servers and all payment transactions are encrypted. Only authorised personnel are permitted to access personal data during their work. Whilst we do our best to protect your personal data, no information transferred over the internet can be guaranteed to be completely secure and you provide your information at your own risk.

## CCTV

For the security and safety of our customers and staff, Machynys Golf Club & Premier Spa may operate CCTV at any of our sites. All areas under CCTV surveillance are clearly sign posted in accordance with the law. If an incident has occurred in store whilst you are present we may share the images with the relevant authorities. No unauthorised personnel will have access to your images and this will not be shared outside of our legal obligations. You have the right to request access to your images captured by CCTV at anytime. Please see section on “Your Rights” for more information on how you can do this.

## Marketing

Where you place an order with us and you have opted in (or in any other case, if you have opted in to receive marketing by email or text message), we may contact you by e-mail or text message with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about and we think may interest you based on the information we hold about you. We may also use your contact details to contact you by phone or post with details of products and services that we think may be of interest to you (unless you have told us you don't want to receive these communications, or you are registered with the Telephone Preference Service). We will hold your data for a period of 18 months before redefining consent from yourself.

## Improving our services

Sometimes we will use your data to help us improve the quality and functionality of the services that we offer. This includes:

- Analysing your recent visits to our website and how you move around different sections of our website for analytical purposes to understand how people use our website so that we can make it more intuitive.
- Troubleshooting, data analysis, testing, research and for statistical and survey purposes by us, all of which helps us to provide the best service that we can. Again, this information is not shared.

## Privacy and Electronic Communications Regulations (PECR)

PECR sits alongside the Data Protection Act and the GDPR. They give people specific privacy rights in relation to electronic communications.

There are specific rules on:

- marketing calls, emails, texts and faxes;
- cookies (and similar technologies);
- keeping communications services secure; and
- customer privacy as regards traffic and location data, itemised billing, line identification, and directory listings.

Machynys Golf Club & Premier Spa has implemented a PECR policy which ensures all of the above is adhered to as the law sets out. Continuous review by our Data Protection Officers at Logic Document ensures all consumer rights under PECR are met the highest possible standards.

## Your Rights

If you wish to access, correct, update or request deletion of your personal data, you can do so at any time.

You can object to the processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.

You have the right to opt-in to marketing communications that we can send to you at any time. You can exercise this right by opting in to the marketing e-mails we send you. Similarly, if we have collected and

processed your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal data. The Information Commissioner's Office is the data protection authority for the UK. You may write to them at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF. Alternatively you may call them on 0303 123 1113. You may also visit their website to fill out an online complaints form at <https://ico.org.uk/make-a-complaint/>.

### **Destruction**

We will only keep your information for as long as is needed to fulfil our duties or required to do so by law. When we destroy your information it is done so securely. If we have hard copies containing your data, we will dispose of these safely through confidential shredding services provided to us by our acting Data Protection Company Logic Document.

### **Changes to our Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws. You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

### **Contact us**

If you have any questions about this Privacy Notice or wish to exercise any of your data protection rights, please contact our Data Protection Officer at:

Email: [info@logicdocument.com](mailto:info@logicdocument.com)

Post: Should be sent for the attention of the Data Protection Officer to: Logic Document, 6 The Arcade, Stepney Street, Llanelli SA15 3TW. Logic Document operates and facilitates this contract.

Please note: All polices are managed directly by Logic Document Ltd our acting Data Protection Team. Any Data Protection related queries or concerns will be dealt with directly via Logic Document.