

<u>Widnes Wild Ice Hockey</u> <u>Club</u>

Privacy Policy

Date policy last reviewed: June 2023

Signed by:

Managing Director: **Danny Davies**

Director of Operations: Mike Hussey Date: _____

Date:

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1. Introduction

This policy explains how Widnes Wild Ice Hockey Club Ltd. ('Widnes Wild,' 'we' or 'us') collects information from you and how we use the information we collect or which you provide. This includes information which we collect or that you provide in person, over the telephone, via email or via any Widnes Wild website or via other online services and platforms (together, our 'Site').

For the purposes of data protection legislation, the controller is Widnes Wild Ice Hockey Club Ltd. of 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ. If you have any questions regarding this policy, please send them to danny.davies@widneswild.co.uk.

2. Information we may collect

You may give us information about you when you do any of the following:

- contact us by phone.
- Contact us by email.
- create an account.
- sign up to receive our various newsletters by email.
- obtain a quote for hire or purchase of our products or services.
- purchase our products or services.

If you want to use any of these services, you may need to provide us with some additional personal information so that we can liaise with you to deal with your request, query, purchase, quotation request, booking, application and/or customer account registration. If you do choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Policy.

This information will be collected primarily from you as information voluntarily provided to us by filling in forms, corresponding with us by post, phone, email or in person. This information might include:

- your full name.
- your business and/or home contact details e.g., address, telephone numbers (including your mobile telephone number) and email address.
- details of the reason(s) for your contact, as set out above.
- if you create an online account your username, password, and details of the product(s) and/or service(s) that you purchase.
- if you make a request for a quotation or an order for hire/purchase/supply of services financial and delivery information which may include your home or work address and telephone number.
- your contact and marketing preferences.
- if you use one of our websites, your IP (Internet Protocol) address to establish your location, unless you are a VPN service.
- if you visit our premises, CCTV footage taken at any of our sites for security purposes.

If you purchase a product or service from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

When you use our websites, we automatically collect information about your device, including your IP address, information about your visit (including how you got to our websites) and how you use our services. We may combine this information with other information you have provided to us or which we have received from other sources.

3. Cookies

We use cookies to collect data from visitors of the Website to monitor traffic, fix bugs, and provide a better user experience.

Our websites use cookies as a control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislative requirements.

Cookies are small files saved to the user's computer hard drive that track, save, and store information about user interactions and usage of the website. This allows the website, through its server, to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computer's hard drive, they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

We use tracking software to monitor visitor statistics to better understand how users interact with our site. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to the user's computer hard drive-in order to track and monitor engagement and usage of the website but will not store, save, or collect personal information.

4. How we use your personal information

We may use your information to:

- provide users with further information about the products and services offered through the website.
- assist users in answering any questions or queries that the user may have submitted.
- contact users who have signed-up for our newsletter, by email or other means.
- communicate with customers in relation to their online orders.
- to process and administer your booking request(s), hire request(s) or order(s) of our products and/or services.
- to perform ID and credit checks to ensure your location and ability to pay.
- process orders that you have submitted.
- notify you of changes to our services.
- administering our websites and apps and for internal business administration (for example, troubleshooting, data analysis, testing, research, statistical and survey purposes).
- protecting our interests and those of third parties and as part of our efforts to keep our services safe and secure.
- managing and operating customers' accounts.
- track and answer customer queries and requests.

We review our retention periods for personal information on a regular basis. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We are legally required to hold some types of information to fulfil our statutory. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or if is set out in any relevant contract you hold with us.

5. What is our legal basis for processing your personal data?

Our lawful basis for processing your personal data under article 6 of GDPR is as follows.

Consent

We will directly ask for your consent to process data:

- When you sign-up for our regular newsletter on our website.
- When you create an account with us on our website or through paper forms or over the phone.
- When you raise a query or issue through our help desk.

6. Contractual

We will undertake processing of your data to perform our contract with you or to take steps to enter a contract. We will collect and use your personal data in the following circumstances:

- When you make a purchase on our website so that we can process your payment, confirm transaction details (typically via email) and arrange delivery of the goods and services.
- When we process your booking request(s), hire request(s) or order(s) of our products and/or services.
- When you request a quote for hiring or purchasing our products and/or services.

7. Our Legitimate Interests

We will process your data for the purposes of our legitimate interest, except where such interests are overridden by your interests or fundamental rights or freedoms:

- We will use your personal data to process and facilitate your account.
- To perform ID and credit checks to ensure your location and ability to pay.

8. Who has access to your data?

We may pass your information to our third-party service providers, agents, subcontractors, and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to process website payments, or to email you, our newsletter. This may include holding your information in cloud-based services. We will only disclose the personal information necessary to deliver the services which will never include using your data for their own direct marketing purposes.

We will not pass your information to any other third parties, unless you have requested us to do so, or we are required to by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We will not share your information with third parties for marketing purposes.

We normally provide information about your visit to Google Analytics to help us improve and optimise our services. We only share this information in a form that does not directly identify you.

Our websites may contain links to third-party websites, including social media buttons like Twitter, LinkedIn, and Facebook. Your use of these third-party services is entirely optional. We are not responsible for the privacy policies and/or practices of these third-party services, and you are responsible for reading and understanding those third-party services' privacy policies.

We employ and contract with people and other entities that perform certain tasks on our behalf and who are under our control (our "Agents"). We may need to share personal information with our Agents to provide products or services to you. Unless we tell you differently, our Agents do not have any right to use personal information or other information we share with them beyond what is necessary to assist us. You hereby consent to our sharing of Personal Information with our Agents.

9. Your security

We employ appropriate security measures to protect against unauthorised access of user data that we store, including personal information.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Transferring your information outside of Europe

We do normally transfer your data outside the European Union, however this may happen from time-to-time as part of the services we offer, for example if we use a cloud-based service provider. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing, or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU to provide you with those services.

11. Your rights

You have the right to ask us not to process your personal information for marketing purposes. You can do this at any time by emailing our managing Director: <u>danny.davies@widneswwild.co.uk</u>

Data protection law gives you the right to access your personal information, to object to the use of your personal information for certain purposes, and the right to delete, restrict or receive a machine-readable copy of your personal information.

Accessing you information – You have the right to access their personal data, this is commonly referred to as subject access.

Correcting your information – You have the right to have inaccurate personal data rectified, or completed if it is incomplete.

Deleting you information – In certain circumstances you have the right to have your personal data erased.

Restrict processing – In certain circumstances you have the right to request the restriction or suppression of their personal data.

Object to processing – You have the right to object to the processing of their personal data in certain circumstances. This includes the absolute right to stop their data being used for direct marketing.

For more details around your data please see our Data Protection Policy. You can exercise any of these rights or complain about our processing of your data by emailing our Data Protection officer: <u>mike.hussey@widneswild.co.uk</u> or writing to as Widnes Wild Ice Hockey Club Ltd, 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 0303 123 1113, via email <u>https://ico.org.uk/global/contact-us/email/</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

12. Changes to this policy

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we collect or use information, we will notify you by posting an announcement on the Website or sending you an email. A user is bound by any changes to the Privacy Policy when he or she uses the Services after such changes have been first posted.