

Privacy Policy

Hengistbury Head Outdoors ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.hengistbury.org you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulations (the GDPR), the data controller is Neil Woods who can be contacted using the following contact details, info@hengistbury.org

The identity of the (interim) Data Protection Officer (the DPO) is John Merritt who will be the point of contact for any issues relating to this policy or to your personal data. The email address you should use to contact them is info@hengistbury.org.

Information we receive from you

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us by filling in forms on our site hengistbury.org (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description, photograph, age, any medical conditions and swim confidence.

Information we collect about you

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform,
- information about your visit, including the full Uniform Resource Locators (URL) clickstream



to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number.

Information we receive from other sources.

This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy below.

The cookies used on our website have been categorised based on categories found in the ICC UK Cookie guide as Category 3: functionality cookies.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

Information you give to us:

We will use this information to:

- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us



- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have specifically consented to this; to notify you about changes to our service; to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you

The legitimate interests that we will rely upon to process this information are:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

If we are not able to process your personal data whether because you do not consent, you withdraw or limit consent, or for any other reason then we will not be able to achieve the purposes listed above



DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information with:

- Our community benefits society, Hengistbury Head Outdoors.
- Selected third parties including:
 - business partners
 - suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 50 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, adults in NW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience
 - analytics and search engine providers that assist us in the improvement and optimisation of our site

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Hengistbury Head Outdoors or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use <https://www.hengistbury.org/terms-and-conditions/> and other agreements; or to protect the rights, property, or safety of Hengistbury Head Outdoors, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Hengistbury Head Outdoors will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

RETENTION OF DATA

Your data is retained and cleansed in accordance with our Data Retention and Cleansing Policy which can be obtained by contacting John Merritt, Data Protection Officer, Hengistbury Head Outdoors. info@hengistbury.org

YOUR RIGHTS

We will only process your data for marketing purposes where you have given express consent to us to do so or where there is a legitimate interest for us to do so. The legitimate interests that we will rely on are as listed above under "Uses made of the Information – Information that we collect about you". In any event, we will only rely on legitimate interest as a grounds for processing your data where we have completed a Legitimate Interest Assessment and where such assessment supports the use of such data processing.

We will usually inform you (before collecting your data) if we intend to use your data for such



purposes or if we intend to disclose your information to any third party for such purposes. We currently disclose personal data for these purposes to the following third parties: Marketing, Facebook, Instagram.

At any time, even if you have previously consented, you have the right to ask us not to process your personal data for marketing purposes and/or not to disclose it to third parties for marketing purposes. You can do this by contacting us using the following email address: info@hengistbury.org You can also use this email address to notify us of any preferences you have in relation to the processing of your data for example as to the frequency of communications that you receive from us or the manner or the subject matter of such communications.

The GDPR also gives you the following rights:

- to access information held about you;
- to request the deletion or correction of information held about you;
- to object to or restrict the processing of information about you;
- to request that information about you be transferred to another person;

To complain to the relevant supervisory authority. In the UK this is the Information Commissioner's Office (ICO) <https://ico.org.uk/> whose contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can exercise these rights by contacting us using the following contact details Hengistbury Head Outdoors, Broadway, Southbourne. Dorset.



THIRD PARTY SITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

COMPLAINTS PROCEDURE

If you have any complaints in relation to how our business has processed your data or in relation to the exercise of your rights as detailed above you can in the first instance raise your concerns by contacting us as follows: Data Protection Officer, Hengistbury Head Outdoors.

You may also contact the Information Commissioner's Office in relation to any such complaints <https://ico.org.uk/>

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to, The DPO at info@hengistbury.org

Updated: 11th November 2023

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