#### PRIVACY POLICY

Pace Health Club and nu spa are committed to protecting and respecting your Privacy.

This policy (together with our terms of website use and any other documents referred to on it) 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.

Our Privacy Policy explains how and why we collect personal information about you. We are committed to responsible management of personal information in accordance with both the Data Protection Act 1998 and the new EU General Data Protection Regulation (GDPR) which will apply from 25th May 2018. The information below sets out how we handle and use your data.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Christian Wrack, Pace Health Club, 4 Cheetham Hill Rd, Manchester, M4 4EW. Our nominated representative for the purpose of the Act is Christian Wrack

## **COLLECTION OF PERSONAL INFORMATION**

We may collect and process the following data about you:

Information that you provide by filling in forms on our site www.pacehealthandnuspa.co.uk (our site). This includes information provided at the time of using our site, making enquiries or requesting further services. We may also ask you for information when you report a problem with our site. If you contact us, we may keep a record of that correspondence.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

Details of your visits to our site and the resources that you access.

In order to receive certain information and to use certain services on this site you will be asked to provide personal information about yourself such as your name, address and email address. When you provide this information to us you consent to our use of that information in accordance with the terms of this Privacy Policy. This information will be used to provide you with the services that you have requested and to provide you with news and information about our products and services. If you no longer want to receive such information just let us know by email pace.manchester@parkinn.com and we will stop sending it.

# 1.Financial information

# 1.1 Purchasing Online

We do not hold any financial information about you. When entering purchasing details at checkout all online transactions are performed through the Paypal (https://www.paypal.com/uk/home)

## 2. Personal details

We will hold the following information about you:

Name

Address

Name of person to whom the purchase is being delivered (if different)

**Delivery address** 

Telephone number

e-mail address

Details of the product(s) that you have purchased

If you are claiming VAT exemption for a product and are required to give us personal health information about you or the user of the product, we will keep this information for no longer than is required by HMRC and we will not otherwise use this information or pass it to any party other than HMRC.

This information will not be held longer than is required by law or than is required to enable us to continue to provide a service for you.

3. Who your data might be shared with

Your data will not be provided to a third party without your express consent.

## STORAGE OF PERSONAL INFORMATION

The data we collect from you will be stored in the UK only. We 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 secure servers. 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. If you lose your password, please contact us immediately.

We will keep your personal information for as long as we need it to provide our products and/or services to you. We will try to keep personal information which we hold about you up to date, but if you think that we are holding information which is inaccurate or you are otherwise unhappy about our use of your personal information then please send us an <u>email</u> to let us know.

We use information held about you in the following ways:

To ensure that content from our site is presented in the most effective manner for you and for your computer.

To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

To carry out our obligations arising from any contracts entered into between you and us.

To allow you to participate in interactive features of our service, when you choose to do so.

To notify you about changes to our service.

To carry out money laundering checks where such checks are necessary. Please see our terms of business for further details.

If you are an existing customer, we will only contact you by letter and by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous legal service to you If you are a new enquirer, we may contact you by post, telephone or electronic means unless you tell us otherwise.

If you do not want us to use your data in this way, please contact us at pace.manchester@parkinn.com

## DISCLOSURE OF YOUR INFORMATION

We will not sell the personal information that we collect from you. We use the personal information which we collect from you to help us provide our products and/or services to you. Some data processing in relation to this site may be carried out for us by a third party and in some cases that may mean that the third party will receive your personal information. Such third provide guarantees to us that they will provide an adequate level of security. Any date processing carried out for us by a third party will be governed by a written contract between us and that third party, which contract will provide that the third party will only act on our instructions. Apart from this we will not share or transfer any personal information with any other third party unless we are required to do so by law.

We may disclose your personal information to third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If Pace Health Club and nu spa 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 website use [ see above] or terms and conditions of services and other agreement; or to protect the rights, property, or safety of , our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **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.

Some websites use 'cookies' which are text only strings of information that the website you are visiting transfers to the cookie file of the browser on your computer. Their purpose is to identify users and to enhance the user's experience by customising web pages. A cookie will usually contain the name of the domain from which the cookie has come, an expiry date for the cookie, and a value, which is usually a random generated unique number.

# **Types of Cookies**

Cookies may be either **first party cookies** or **third party cookies**. **First party cookies** are used by the website owner and **third party cookies** are used by a third party such as an advertiser or a web designer or a website host.

Cookies may be **session cookies**, which are temporary cookies that remain in the cookie file of your browser until you leave the site or **persistent cookies**, which remain in the cookie file for much longer. How long persistent cookies remain in your browser depends on the duration given to the cookie.

Cookies may record personal data such as name, and email address and/or non-personal data such as IP address and unique but anonymous customer identity.

This site uses first party cookies to record on an anonymous basis

- the precise time that you visit this site;
- the precise web pages that you view;
- the websites visited by you before and after you visit this site;
- to compile anonymous, aggregated statistics that allow us to understand how users use this site to help us to improve the operation of this site and
- items placed in the shopping basket
- Please note that our cookies will not store your personal details. This site does not use third party cookies.

This site uses first party cookies to record

- the precise time that you visit this site;
- the precise web pages that you view and the websites visited by you before and after you visit this site;
- to help us recognise you as a unique visitor when you return to this site and to allow us to tailor content for you
- to compile anonymous, aggregated statistics that allow us to understand how users use this site to help us to improve the operation of this site;
- to allow you to carry information across pages of our site an avoid having to re-enter information;
- to allow you to maintain a shopping basket;

This site does not use third party cookies.

# **Refusing cookies**

You are entitled to refuse the use of cookies on this site. However, search and shopping basket functionality will not work.

You can refuse cookies by making modifying the settings in your browser.

For more information about how to manage cookies visit http://www.allaboutcookies.org/

## **IP ADDRESSES**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

## YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. 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. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your date. You can also exercise the right at any time by contacting us at Pace Health Club, 4 Cheetham Hill Rd, Manchester, M44EW, 0161 837 8377

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.

### **ACCESS TO INFORMATION**

You are entitled under the Data Protection Act 1998 to a copy of the personal information that we hold about you if you apply to us in writing.

You have a number of rights under GDPR. These include the right to:

- See the information that we hold about you
- Request that personal data be amended if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued use
- Block, restrict or object to the processing of your personal data (if applicable)

# **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and where appropriate, notified to you by e-mail.

# CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: Pace Health Club, 4 Cheetham Hill Rd, Manchester, M44EW, 0161 837 8377