# Customer GDPR privacy policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the <u>General Data Protection Regulation</u>, which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

# Key terms

It would be helpful to start by explaining some key terms used in this policy:

Company name: Ensarb Limited
<b>Trading names:</b> Best Day Ever Venues, The Ashes Barns, Pendrell Hall, The Mill Barns & Foxtail Barns
VAT registration number: 904 5746 21
Company number: 6586604
<b>Registered office:</b> The Ashes, Leek Road, Endon, Staffordshire ST9 9AX
Liam Kerr
Any information relating to an identified or identifiable individual
Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Data concerning health, sex life or sexual orientation

# Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address, telephone number and address
- information to enable us to check and verify your identity, e.g. your date of birth
- your gender information, if you choose to give this to us











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- CCTV images of you
- your car registrations details
- your personal or professional interests
- information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions

This personal information is required to provide our venue hire, accommodation and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing our venue hire, accommodation and services to you.

# How your personal information is collected

We collect most of this personal information directly from you - in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from cookies on our website for more information on our use of cookies, please see our cookie policy
- via our IT systems, e.g:
  - door entry systems and reception logs;
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

# How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing SO:





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What we use your personal information for	Our reasons
To provide our venue hire, accommodation and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Ensarb Limited	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information
	To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, service range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you
	To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract
	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing booking and new service offerings
Statutory returns	To comply with our legal and regulatory obligations





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What we use your personal information for	Our reasons
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to:	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers]
- existing and former customers;	
- third parties who have previously expressed an interest in our services;	
- third parties with whom we have had no previous dealings.	
Security and compliance with premises licence and regulation	To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

# Promotional communications

We may use your personal information to send you updates (by email, telephone or post) about our venues, accommodation and services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes without your explicit consent to do so.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at info@ensarb.com
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.





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# Who we share your personal information with

We routinely share personal information with:

- third parties we use to help deliver our services to you, e.g. software providers (such as Sirvoy and Wedding Planner);
- Consall Hall Estate Limited (company number: 11317067) whose registered office is at c/o Howsons, Winton House, Stoke Road, Stoke on Trent ST4 2RW who are our sister hotel and provide accommodation for Foxtail Barns.
- Jenkinsons Caterers (Stafford) Limited (company number: 2864589) whose registered office is at St Albans Road, Stafford ST16 3DR who are the sole catering providers to our venues;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. third party wedding suppliers;
- the local registrar;
- our bank;
- our accountants;
- our solicitors.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## Where your personal information is held

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal information with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: '**Transferring your personal information out of the UK and EEA**'.











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# How long your personal information will be kept

We will keep your personal information for the duration of your booking with us and for so long as we are providing venue hire, accommodation and services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy.

# Transferring your personal information out of the UK and EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK and/or European Economic Area (EEA), eg:

- with your and our service providers (e.g. software providers) located outside the UK/EEA;
- if you are based outside the UK/EEA.

These transfers are subject to special rules under European and UK data protection law.

These non-UK/EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. If you would like further information please contact our Data Protection Representative (see 'How to contact us' below).

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations





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To object	The right to object:
	- at any time to your personal information being processed for direct marketing (including profiling);
	- in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals'</u> rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us or our Data Protection Representative see below: 'How to contact us';
- let us have enough information to identify you for e.g. your full name, address and telephone number;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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













## How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The <u>General Data Protection Regulation</u> also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <u>https://ico.org.uk/concerns</u> or telephone: 0303 123 1113.

## Changes to this privacy policy

This privacy notice was published on 19<sup>th</sup> June 2020 and last updated on 19<sup>th</sup> June 2020.

We may change this privacy notice from time to time - when we do we will inform you via our website.

#### How to contact us

Please contact us and/or our Data Protection Representative by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Our Data Protection Representative's contact details
Company name: Ensarb Limited	Liam Kerr
	The Ashes
Address: The Ashes, Leek Road, Endon,	Leek Road
Staffordshire ST9 9AX	Endon
	Staffordshire
Telephone number: 01782 502164	ST9 9AX
Email address: info@ensarb.com	info@ensarb.com
	01782 969521

# Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).











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