



## What is the website's privacy policy?

### **BEST FRIEND LIMITED t/a The Fleece Hotel CUSTOMER PRIVACY POLICY**

Best Friend Limited (BF) Limited is a company registered in England and Wales (collectively referred to as "BF", "we" or "us" in this policy).

#### **1. OVERVIEW**

Maintaining the security of your data is a priority at Best Friend Limited (BF), and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. BF is also dedicated to being transparent about what data we collect about you and how we use it.

This policy, which applies whether you visit us or we visit you, use your mobile device or go on line, provides you with information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

#### **2. HOW WE USE YOUR DATA**

##### **a. General**

Best Friend Limited (BF) and its clients (and trusted partners acting on our behalf) uses your personal data:

- to provide goods and services to you;
- to make a tailored website available to you;
- to manage any registered account(s) that you hold with us;
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- with your agreement, to contact you electronically about promotional offers and products and services which we think may interest you;
- for market research purposes - to better understand your needs;
- to enable BF and its clients to manage customer service interactions with you; and
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

Other Marketing

##### **b. Promotional communications**

BF uses your personal data for electronic marketing purposes (with your consent) and may send you postal mail to update you on the latest BF offers.

BF aims to update you about products & services, which are of interest and relevance to you as an individual.

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

1. changing marketing preferences via your BF account;
2. making use of the simple "unsubscribe" link in emails or the "STOP" number for texts; and/or
3. contacting BF via the contact channels set out in this Policy.

### **c. Mailing List**

If you are a member of our mailing list, we may collect data directly from you, as well as analysing your browsing and purchasing activity, both on-line and in store, and your responses to marketing communications. The results of this analysis, together with other demographic data, allows us to ensure that we contact you with information on products and offers that are relevant to you. To do so, we use software and other technology (automated processing).

### **d. Web Banner Advertising**

If you visit our websites, you may receive personalised banner advertisements whilst browsing other websites. Any banner advertisements you see will relate to products you have viewed whilst browsing our websites on your computer or other devices. These advertisements are provided by BF via market leading specialist providers using 'cookies' placed on your computer or other devices (see further information on the use of cookies in our Cookie Policy). You can remove or disable cookies at any time - see below for further information.

## **3. Sharing data with third parties**

### **a. Our service providers and suppliers**

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include IT, delivery and marketing service providers. BF only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to BF and to you, and for no other purposes.

#### **Other third parties**

Aside from our service providers, BF will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data with:

- our carefully selected partners who provide 'BF' branded products and services (for example hotels and attractions), if we have your consent to do so;
- credit reference agencies where necessary for card payments;
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
- to comply with our legal obligations;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and customers.

#### **International transfers**

To deliver products and services to you, it is sometimes necessary for BF to share your data outside of the European Economic Area. This will typically occur when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws.

If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice is to use 'standard data protection clauses' which have been approved by the European Commission for such transfers. Those clauses can be accessed here.

### **b. How long do we keep your data?**

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 6 years.

## **WHAT PERSONAL DATA DO WE COLLECT?**

BF may collect the following information about you:

- your name, age/date of birth and gender;
- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
- purchases and orders made by you;
- your on-line browsing activities on BF websites;
- your password(s);
- when you make a purchase or place an order with us, your payment card details;
- your communication and marketing preferences;
- your interests, preferences, feedback and survey responses;
- your location;
- your correspondence and communications with BF; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).

Our website are not intended for children and we do not knowingly collect data relating to children.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set up an on-line account on our websites, or send an email to our customer services team. Other personal data is collected indirectly, for example your browsing or shopping activity. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

We also receive personal data from trusted third parties who provide services to our customers under the BF brand, which we use to analyse customer behaviour and improve our tailored marketing.

## **4. HOW WE PROTECT YOUR DATA**

### **Our controls**

BF is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data;
- regular cyber security assessments of all service providers who may handle your personal data;
- regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;
- daily penetration testing of systems;
- security controls which protect the entire BF IT infrastructure from external attack and unauthorised access; and
- internal policies setting out our data security approach and training for employees.

## **5. WHAT YOU CAN DO TO HELP PROTECT YOUR DATA**

BF will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from BF asking you to do so, please ignore it and do not respond.

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety both in relation to BF and more generally: --

- keep your account passwords private. Remember, anybody who knows your password may access your account.
- when creating a password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be

easily obtained. We also recommend that you frequently change your password. You can do this accessing your account, clicking 'your account', clicking 'your data' and selecting 'change password'.

- avoid using the same password for multiple online accounts.

## **6. YOUR RIGHTS**

You have the following rights:

- the right to ask what personal data that we hold about you at any time, subject to a fee specified by law (currently £10);
  - the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
  - (as set out above) the right to opt out of any marketing communications that we may send you.
- If you wish to exercise any of the above rights, please contact us using the contact details set out below.

## **7. LEGAL BASIS FOR USING DATA**

We are required to set out the legal basis for our 'processing' of personal data.

Legal basis for BF processing customer personal data

General

BF collects and uses customers' personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- the purposes of complying with our duties and exercising our rights under a contract for the sale of goods to a customer; or
- complying with our legal obligations.

In general, we only rely on consent as a legal basis for processing in relation to sending direct marketing communications to customers via email or text message.

Customers have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

## **8. Our legitimate interests**

The normal legal basis for processing customer data, is that it is necessary for the legitimate interests of BF, including:-

- selling and supplying goods and services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers
- understanding our customers' behaviour, activities, preferences, and needs;
- improving existing products and services and developing new products and services;
- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries, complaints or disputes;
- managing insurance claims by customers;
- protecting BF, its employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to BF;
- effectively handling any legal claims or regulatory enforcement actions taken against BF; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

## **9. COOKIES**

Our websites use cookies to collect information. This includes information about browsing and purchasing behaviour by people who access our websites. This includes information about pages viewed, products purchased and the customer journey around our websites. Detailed information is set out in our Cookie Policy.

### **a. Cookies Policy**

What are cookies?

Like most websites, BF websites use cookies to collect information. Cookies are small data files which are placed on your computer or other devices (such as smart 'phones or 'tablets') as you browse this website. They are used to 'remember' when your computer or device accesses our websites. Cookies are essential for the effective operation of our websites and to help you shop with us online. They are also used to tailor the products and services offered and advertised to you, both on our websites and elsewhere.

Information collected

Some cookies collect information about browsing and purchasing behaviour when you access this website via the same computer or device. This includes information about pages viewed, products purchased and your journey around a website. We do not use cookies to collect or record information on your name, address or other contact details. BF can use cookies to monitor your browsing and purchasing behaviour.

### **b. How are cookies managed?**

The cookies stored on your computer or other device when you access our websites are designed by:

- BF, or on behalf of BF, and are necessary to enable you to make purchases on our website;
- third parties who participate with us in marketing programmes; and
- third parties who broadcast web banner advertisements on behalf of BF.

What are cookies used for?

The main purposes for which cookies are used are: -

1. For technical purposes essential to effective operation of our websites, particularly in relation to on-line transactions and site navigation.
2. For BF to market to you, particularly web banner advertisements and targeted updates.
3. To enable BF to collect information about your browsing and shopping patterns, including to monitor the success of campaigns, competitions etc.
4. To enable BF meet its contractual obligations to make payments to third parties when a product is purchased by someone who has visited our website from a site operated by those parties.

### **c. How do I disable cookies?**

If you want to disable cookies you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below: -

For Microsoft Internet Explorer:

1. Choose the menu "tools" then "Internet Options"
2. Click on the "privacy" tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced
2. Under "Privacy and security," click "Content settings".
3. Click "Cookies"

For Safari:

1. Choose Preferences > Privacy

## 2. Click on "Remove all Website Data"

For Mozilla firefox:

1. Choose the menu "tools" then "Options"
2. Click on the icon "privacy"
3. Find the menu "cookie" and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files"> "Preferences"
2. Privacy

### **d. What happens if I disable cookies?**

This depends on which cookies you disable, but in general the website may not operate properly if cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our sites. If you disable all cookies, you will be unable to complete a purchase on our sites.

### **10. Google Analytics**

When someone visits [www.thefleecehotel.com](http://www.thefleecehotel.com) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

As part of the registration process for our monthly e-newsletter, we collect personal information. We use that information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, Campaign Monitor, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see Campaign Monitor's privacy notice. You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer John Gallery

### **11. Wi-Fi**

*When you use Best Friend Limited t/a The Fleece Hotel Wi-Fi we may collect data about:*

- a) your device;*
- b) the volume of data which you use;*
- c) the websites and applications which you access; and*
- d) your usage by access time, frequency and location.*

### **12. Mobile Apps**

If you are using Mobile Apps then certain functionality requires location data from your device to work e.g. find my nearest restaurant. If you do not want the Mobile Apps to use your location data please change your settings on your device: some Mobile Apps ask you if you want to do this when you download them e.g. iPhone apps or depending on your device others may ask you when you access them e.g. BF mobile website. If you change your mind and want to opt out later you will need to change the settings on your Mobile App. Please see the relevant help sections for your device.

The Mobile Apps use "remember me" functionality so that when you use a Mobile App it remembers your details which are held on your device. This means you do not need to login if you are an BF Première Club member each time you access a Mobile App or insert your details if you have bought tickets from us before via the Mobile App. If you do not want BF to use this functionality please alter your settings on your device for the Mobile App. If you are not sure how to do this please refer to the help section on your device.

### **13. BF Social Media**

If you are using BF Social Media, please remember that BF Social Media are provided via social media sites which have their own functionality, terms and privacy policies. You should be aware that these functions are part of the social media site, and are subject to the social media site's terms and privacy policy. Please ensure you have read these carefully and have checked your personal settings to ensure you are happy with how your information will be used by the social media site. BF Social Media may make use of these functions but BF does not control them and is not responsible for them.

BF Social Media may allow you to see your friend's details and contact them. An example of this would be our Event Planner within Facebook. Where this is the case, this function is provided by the social media site provider and not BF. BF does not hold your friend's details and any messages you send to friends via BF Social Media use the relevant social media's functionality and are not sent from BF.

### **14. Web beacons on the Website, Mobile App and in BF's email marketing messages**

The Website, Mobile Apps, BF Social Media and email marketing messages from BF may contain web beacons, and we use them in conjunction with BF cookies and third party cookies to collect information. For example, BF may use web beacons to do the following: count the number of visitors to the Website, Mobile Apps and BF Social Media; establish levels of interest in particular items or aspects of the Website, Mobile Apps and BF Social Media; or particular products and services available on the Website, Mobile Apps and BF Social Media; determine whether you have acted on an email or clicked on a link (e.g. where this is a condition of entering a competition); compile aggregated statistics on how successful a specific marketing campaign or a competition has been; assess whether advertisements or competitions result in purchases being made; and/or understand how popular a particular meal or service is, and how interest levels vary between particular BF operations. Web beacons do not store additional information on your device but, by communicating with cookies on your device, they can provide us with personal information (e.g. when you have opened an email marketing message from us). If you object to web beacons, we recommend you follow the instructions for deleting and disabling cookies set out above.

### **15. CONTACT INFORMATION**

If you have any questions about how BF uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: 01748 901214
- e-mail us at: [flockto@thefleecehotel.com](mailto:flockto@thefleecehotel.com) or
- write to us at: Best Friend Limited (BF) Limited, 1 Zetland Square, Richmond, North Yorkshire DL10 7AB

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>.

### **16. UPDATES**

This policy was last updated in May 2018