

# GDPR – our Data Management Policy

Avisé la Fin Ltd trading as The Horseshoe (The Offord 'Shoe') 90 High Street Offord Darcy St Neots Cambridgeshire PE19 5RH ("We") are committed to protecting and respecting your privacy.

This policy sets out how we may collect personal data from you, or that you provide to us, and how it will be processed by us. Please read the following carefully to understand our policies regarding your personal data and how we will treat it. By visiting [www.theoffordshoe.co.uk](http://www.theoffordshoe.co.uk) and by providing personal data to us, such as through our loyalty scheme, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Avisé la Fin Ltd trading as The Horseshoe (The Offord 'Shoe') 90 High Street Offord Darcy St Neots Cambridgeshire PE19 5RH. Avisé la Fin Ltd does not trade as any other entity.

## Information we may collect from you

We may collect and process the following data about you:

- **Information you give us.** This may arise from you filling in forms, such the booking form, or web site e-mail on our site [www.theoffordshoe.co.uk](http://www.theoffordshoe.co.uk) (**our site**) or by calling us by phone, e-mail or otherwise. This includes information you provide when you complete the membership application form for our 'VIP' loyalty scheme managed by [www.gainloyalty.com](http://www.gainloyalty.com) You may change or update your personal details, contact preferences etc there if you have signed up for our loyalty scheme. The information you give us may include your name, address, e-mail address and phone number.
- **Information we collect about you.** With regard to each of your visits to our web site the technology built in may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, 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); pages 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), and methods used to browse away from the page and any phone number used to call our business.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites or companies that provide marketing information that we may avail ourselves of. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our site. We work 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) and we may receive information about you from them.

## 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 administer your loyalty scheme membership;
- for the provision of our services you have or will request;

- providing always that you have given to us the necessary consent, 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;
- providing always that you have given to us the necessary consent, to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. Where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you decide at any time that you no longer want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please contact us at The Data Controller Advise la Fin Ltd trading as The Horseshoe 90 High Street Offord Darcy St Neots Cambridgeshire PE19 5RH.to notify you about changes to our service;
- in-house research and statistical analysis;
- to communicate with you about our loyalty membership, special offers, and other activities;
- to ensure that content from our site is presented in the most clear manner for you and for your computer, tablet, or smart phone.

**Information we collect about you.** We will use this information to:

- administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our site to ensure that content is presented in the most clear manner for you and for your computer, tablet, or smart phone.
- allow you to participate in interactive features of our service, when you choose to do so;
- 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 may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## Disclosure of your information

We may share your personal information only with ‘Gainloyalty.com’ where you may ‘opt-in’ or ‘opt-out’ to their GDPR policy. By logging in to your account at GainLoyalty.Com you can control what happens to your ‘Gain Loyalty’ membership with The Horseshoe. You can disallow them from using your data in any way, but still collect your loyalty points, and spend them in The Horseshoe. If you prevent us from contacting you or close your GainLoyalty Horseshoe VIP Loyalty account you will lose all accrued points and be removed from the scheme.

We will not disclose your personal information to any third parties, unless;

- under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of our business, 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 stored within the European Economic Area ("EEA") and will not be transferred outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We hold only the data you provide to book our services. The data related to your membership of our VIP Loyalty Scheme is held by GainLoyalty.com.

Where we, or 'Gain Loyalty' have given you (or where you have chosen) a password that 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.

While we use strong encryption, both when your information is moving to or from our web services and also whilst your information is held by us, unfortunately the transmission of information via the internet can never be 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.

## **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will always 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 not checking the necessary boxes to give such consent on the forms we use to collect your data. You can also exercise the right at any time by contacting us at the address provided.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and providers. 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.

If, at any time, you want to verify, update or amend your personal data or preferences please write to us at the address provided. Verification, updating or amendment of personal data will take place within 28 days of your request.

## **Access to information**

You have the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 plus VAT to meet our costs in providing you with details of the information we hold about you.

## **Changes to our Privacy Policy**

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

## **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to The Data Protection Controller, The Horseshoe, 90 High Street, Offord Darcy, St Neots, PE19 5RH.