

CHARLTON HOUSE HOTEL & SPA PRIVACY AND COOKIES NOTICE

This is the Charlton House Hotel & Spa privacy and cookie notice. This privacy policy and cookie notice is subject to changes as and when required.

1. Introduction and summary

1.1. Introduction

Thanks for reading our privacy notice. It tells you how we collect, use and share your personal information and what your rights are - and how to exercise them.

This notice applies to you if you are:

- A customer: a health club member (or their guest), spa user, hotel/restaurant guest or someone who buys products from our website, a health club, hotel or spa
- A supplier: a sole trader or partnership or a contact for us at a corporate supplier who provides services to us
- A consultant: an adviser, consultant, or other professional expert
- A job applicant: someone who is interesting in working for us
- An interested person: someone who makes an enquiry or complaint or corresponds or enters a competition with us or visits us, who isn't in any of the categories above
- A relative of a member of our staff: a close family member or next of kin of a member of our staff, or
- A website visitor or user of social media: a visitor to our website or user of social media.

This notice doesn't apply to Charlton House Hotel & Spa staff, a freelance service providers (personal trainer, swimming instructor or class instructor) or shareholders. There are a couple of technical definitions to get out of the way first. Here they are.

By "**personal information**" we mean personal data as defined in UK data protection law. In general, it means any information relating to you, which identifies you or allows you to be identified. That may be your name, an ID number, location, an online identifier or factors specific to you (e.g. physical, physiology (thoughts, feelings), genetic, mental, economic, cultural or social factors).

By "**sensitive**" personal information we mean two things: 1. what's technically known as "special categories" (personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying an

individual, data concerning health or data concerning an individual's sex life or sexual orientation) and 2. criminal data (criminal offences or related security measures, including the alleged commission of offences, proceedings for an offence committed or alleged to have been committed or the disposal of those proceedings, including sentencing).

For ease, we've split this privacy notice up into parts:

Part 1: Introduction and summary

Part 2: Important information about your rights in relation to consent and to object to our use of your personal information

Part 3: Key information required by the GDPR

Part 4: Cookies and similar technologies

If you have any queries about this privacy notice, please contact us. Please see "Our identity and contact details" in section a and "Data protection officer" section b of "Key information required by the GDPR" below for our data protection officer's contact details.

12. Summary

Here's a summary overview to help you navigate. Find yourself in the left hand column, then read across the table.

Type of individual (current, past or prospective)	Our main uses of your personal information	Where to find out more
<u>Health club members</u> : a member of our health club or a guest of a member.	<p>To enter into a contract with you, your employer or a third party provider of gym services.</p> <p>To provide agreed health club services to you as our customer.</p>	<p>How to withdraw your consent or object to our use (where applicable)</p> <p>Look in Part 2.</p> <p>It tells you how to withdraw any consent you've given (see section j as well) and how to object to both direct marketing and to our use where it's based</p>

	<p>To keep accounts and records.</p> <p>We may, if you consent, send you offers and news by email. We track whether emails are opened and whether links in the emails are clicked on.</p> <p>To identify you through our club entry systems and record when you are in the club. Our wristbands may be used for club entry but also for logging into your MyWellness app on your phone when using Technogym equipment in the club, for contactless payment and as a locker key.</p> <p>To interact with you through our apps. The MyFitApp lets you book sessions, communicate with the club and see club offers and news, which are personalised if you are in the club (e.g. with today's offer from the café). The MyZone app works with a cardio belt to monitor heart rate; we do not get your personal information from that app. The MyWellness app works with gym equipment supplied by Technogym; we do not get your personal information from that app either.</p> <p>To record telephone calls with you for training, monitoring and evidential purposes; we record inbound and outbound calls to and from the head office call centres and may record calls to and from the legal department.</p> <p>To record CCTV images at some of our clubs for the prevention and detection of crime (both revenue and asset protection) and for health and safety (for</p>	<p>on a balancing test (called "legitimate interests") which involves weighing our interests or a third party's interests against your rights.</p> <p>Other information</p> <p>Look in Part 3; here's what's in the different sections.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Sections a and b: our contact details <input type="checkbox"/> Section c: the purposes and legal basis for our use of your personal information <input type="checkbox"/> Section d the legitimate interests often underpinning our use of your personal information <input type="checkbox"/> Section e: the types of personal information we may get from someone other than you <input type="checkbox"/> Section f: third parties with whom we may share your personal information <input type="checkbox"/> Section g: transfers (exports) of personal information <input type="checkbox"/> Section h: storage periods <input type="checkbox"/> Section i: your GDPR rights <input type="checkbox"/> Section j: withdrawing consent <input type="checkbox"/> Section k: complaints to the ICO
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	<p>example at the poolside). ANPR is used by Parking Eye at some of our sites but we do not have access to images.</p> <p>If you use our public wifi (provided by BT), BT will collect your marketing preferences and share them with us.</p> <p>If you pay through one of our tills, provided by Clover, your payment receipt is stored by Clover.</p> <p>To interact with you on social media (Facebook, Twitter or Instagram).</p> <p>If you are under 16, your record will be linked to your parent's and we will normally communicate with your parent rather than with you.</p> <p>Your personal information may be shared intra-group if you use other health clubs, under our cross-usage policy.</p> <p>If you have signed up with a third party gym services provider, then depending on the provider, they may provide us with your personal information including your answers to our pre-exercise questionnaire or may simply validate your membership when you sign up with us.</p> <p>For related purposes such as analysis to help us find new members.</p>	<ul style="list-style-type: none"><input type="checkbox"/> Section l: information you must provide (either by law or under a contract)<input type="checkbox"/> Section m: sources of personal information (where you aren't the source).<input type="checkbox"/> Section n: automated decisions. <p>Customers may find further customer-specific information on forms, on pre-exercise and spa treatment questionnaires, club rules and in their contracts</p>
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<p><u>Spa users:</u> a user of a spa at one of our health clubs or hotels.</p>	<p>To enter into a contract with you and to provide agreed spa services to you as our customer.</p> <p>To keep accounts and records.</p> <p>We may, if you consent, send you offers and news by email. We track whether our emails are opened and whether links in the emails are clicked on.</p> <p>To interact with you through our spa app.</p> <p>To record telephone calls with you for training, monitoring and evidential purposes; we record inbound and outbound calls to and from the spa call centre and may record calls to and from the legal department.</p> <p>To record CCTV images at our spa receptions for the prevention and detection of crime. ANPR is used by Parking Eye at some of our sites but we do not have access to images.</p> <p>If you pay through one of our tills, provided by Clover, your payment receipt is stored by Clover.</p> <p>To interact with you on social media (Facebook, Twitter or Instagram).</p> <p>For related purposes such as analysis to help us find new spa users.</p>	
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<p><u>Hotel guest:</u> a hotel or restaurant guest</p>	<p>To enter into a contract with you or your employer or a third party who is paying your hotel bill.</p> <p>To provide agreed hotel accommodation and/or restaurant food to you as our customer.</p> <p>To keep accounts and records.</p> <p>We may, if you consent, send you offers and news by email. We track whether our emails are opened and whether links in the emails are clicked on.</p> <p>To record CCTV images at our hotels for the prevention and detection of crime.</p> <p>If you use our public wifi (provided by Sky), Sky will collect your marketing preferences and share them with us.</p> <p>If you pay through one of our tills, provided by Clover, your payment receipt is stored by Clover.</p> <p>To interact with you on social media (Facebook, Twitter or Instagram).</p> <p>If you book hotel accommodation through a third party such as a travel agent or portal, we will receive your information from that third party and will confirm the booking and the fact you stayed at the hotel with them for payment purposes.</p>	
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<p><u>Product customers:</u> an individual who buys products from our website, or from our spa, health club or hotel</p>	<p>To enter into a contract with you and to provide you with the product you have bought.</p> <p>To keep accounts and records.</p> <p>We may, if you consent, send you offers and news by email. We track whether our emails are opened and whether links in the emails are clicked on.</p> <p>If you pay through one of our tills, provided by Clover, your payment receipt is stored by Clover.</p>	
<p><u>A supplier:</u> a sole trader or partnership or a contact for us at a corporate supplier who provides services to us as a business</p>	<p>To receive agreed services from you or your employer or company.</p> <p>To keep accounts and records.</p>	
<p><u>A consultant:</u> an adviser, consultant or other professional expert who provides services to us as a business</p>	<p>To receive agreed services from you or your employer or company.</p> <p>To keep accounts and records.</p>	
<p><u>A job applicant:</u> someone who is interested in working for us</p>	<p>To evaluate your application and enter into a services or employment contract or similar contract with you</p>	

<p><u>A relative of a member of our staff:</u> a close family member or next of kin of a member of our staff</p>	<p>Our member of staff may give us your name, address and date of birth which we may use to contact you in an emergency.</p>	
<p><u>A visitor to our website or social media users:</u> a visitor to our website or social media user.</p>	<p>We advertise on Facebook, Twitter and Instagram. You may see one of our ads as a result.</p> <p>We use Google Analytics on our site which captures where individuals discontinue the order process; the report Google gives us does not identify the individuals.</p>	<p>Look in Part 3:</p> <p>Sections a and b: our contact details</p> <p>Section i: your GDPR rights</p> <p>Section k: complaints to the ICO</p> <p>Section m: sources of personal information (where you aren't the source).</p>

2. **Important information about your rights in relation to consent and to object to our use of your personal information**

Your rights in relation to consent: You may, at any time, withdraw your consent or explicit consent to us using your personal information or sensitive personal information as summarised below.

- To send you direct marketing based on your consent. This may be by email, phone or text. We track whether emails are opened and links clicked on. To withdraw consent, please use the optout option in the direct marketing. Members may also change their settings in the member portal.
- To hold and use your health data to provide you with health club membership and/or spa treatments. To withdraw consent, please contact us.
- To make reasonable adjustments, for persons with a disability. To withdraw consent, please contact us.
- To set and read cookies on your device. We will rely on your browser settings to indicate your consent to the use of cookies. To withdraw your consent, please adjust your browser settings. Please see "Cookies and similar technologies" below for instructions.

Please see:

- section a in "Key information required by the GDPR" below for our contact details
- section c in "Key information required by the GDPR" below for further details of where we rely on your consent
- section j in "Key information required by the GDPR" below for further details of your right to withdraw consent, and
- "Cookies and similar technologies" below for information about cookies and similar technologies used on this site.

Your right to object to our use of the "legitimate interests" basis for processing: You may, at any time, object to direct mail and our use of your personal information which is based on our own or others' legitimate interests, as summarised below.

Our own legitimate interests

- To operate and improve our business
- To manage relationships with customers
- To manage relationships with suppliers
- To detect and prevent fraud
- To send you direct mail if you are not registered with the Mail Preference Service and do not object
- To promote and advertise our products and services online
- For internal group administration, for example to enable members to benefit from the cross-usage policy across our health clubs
- For network and information security
- To report possible criminal acts/threats to competent authorities.

Others legitimate interests

We operate CCTV at our clubs, spas, hotels and head office. We have entry systems to our clubs and we record calls to and from our call centres and the legal department. It is in the legitimate interests of anyone visiting our clubs, spas and hotels to have a secure and safe environment; of our callers to benefit from quality checks and to evidence calls made and received.

You may object to our use on that basis. To exercise your right, please contact us. Please see:

- section a in "Key information required by the GDPR" below for our contact details
- section d in "Key information required by the GDPR" below for further details of our reliance on the legitimate interests basis for processing, and
- section i in "Key information required by the GDPR" below for further details of your right to object.

3 Key information required by the GDPR

Here are important details about us and our use of your personal information.

Requirement	Our details
<p>a. Our identity and contact details</p> <p>Identity and contact details and, where applicable, of the representative</p>	<p>KOP Properties (UK) Limited t/a Charlton House Hotel & Spa Limited, company number 13967609</p> <p>Address: 2 New Bailey Square, 6 Stanley Street, Salford, Manchester, United Kingdom, M3 5GS</p> <p>Telephone: 01749 342008</p> <p>Email: info@charltonhouse.uk</p> <p>We are registered as a controller with the Information Commissioner. Our registration numbers are above. It would be very helpful if you would tell us exactly why you are contacting us. For example to exercise a</p>
<p>b. Data protection officer and queries</p> <p>Contact details of the data protection officer, where applicable</p>	<p>right, please put the name of the right in the subject line of the email. Thank you.</p> <p>To contact our data protection officer, please use the following details:</p> <p>Address: 2 New Bailey Square, 6 Stanley Street, Salford, Manchester, United Kingdom, M3 5GS</p> <p>Telephone: 01749 342008</p> <p>Email: dataprotection@charltonhouse.uk</p>

c. Purposes and legal basis The purposes of the use for which the personal information is intended as well as the legal basis for the use	Here is a summary of the purposes for which we use personal information and the legal bases for our use.		
	Our purposes	Legal basis (all personal information)	Additional legal basis (sensitive personal information)
	To enable us to provide our health club, spa and hotel	<ul style="list-style-type: none"> • Contract • Legal obligation 	<ul style="list-style-type: none"> • Explicit consent