

Privacy & Cookie Policy

Version: 2.0NM Date Updated: 24/05/18 Next Review Date 23/05/19

CONTENTS

	PAGE
Policy Statement	3
Privacy Policy	3
The internet	7
Cookies	7
Links	9
Further Information	9

1 Policy Statement

All-Aboard Watersports (registered number 1151374), whose registered office is at Baltic Wharf, Cumberland Road, Bristol, BS1 6XG, knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy and forms part of our website terms and conditions ('Website Terms'). By accepting our Website Terms or by visiting www.allaboardwatersports.co.uk ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.

2 Privacy Policy

All-Aboard Watersports ("We") are committed to protecting and respecting your privacy. This policy 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. By visiting www.allaboardwatersports.co.uk you are accepting and consenting to the practices described in this policy.

For the purpose of the General Data Protection Regulations (the GDPR), the data controller is Nicola Murdoch, CEO, All-Aboard Watersports of Baltic Wharf, Cumberland Road, Bristol, BS1 6XG who can be contacted using the following contact details, 0117 929 0801 or admin@allaboardwatersports.co.uk.

The identity of the Data Protection Officer (the DPO) is Nicola Murdoch of All-Aboard Watersports of Baltic Wharf, Cumberland Road, Bristol, BS1 6XG who will be the point of contact for any issues relating to this policy or to your personal data. The email address you should use to contact them is <u>admin@allaboardwatersports.co.uk</u>.

2.1 Information we collect from you

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us by filling in forms on our site mount-batten-centre.com (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description, photograph, age, any medical conditions and swim confidence.
- Information we collect about you. With regard to each of your visits to our site we will automatically collect the following information:
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, 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), products 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), methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources. This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and

combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. We are working closely 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). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

2.2 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. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy in section 4 of this policy.

The cookies used on All-Aboard Watersports' website have been categorised based on categories found in the ICC UK Cookie guide as Category 3: functionality cookies.

2.3 Uses made of this information

We use information held about you in the following ways:

- Information you give to us. We will use this information:
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- 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;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have specifically consented to this;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- Information we collect about you. The legitimate interests that we will rely upon to process this information are:
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to 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 will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

• If we are not able to process your personal data whether because you do not consent, you withdraw or limit consent, or for any other reason then we will not be able to achieve the purposes listed above.

2.4 Disclosure of your information

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in BS1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If All-Aboard Watersports 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 use http://www.allaboardwatersports.co.uk/wp-content/uploads/2017/04/Terms-and-Conditions-updated-Jan-18-1.pdf and other agreements; or to protect the rights, property, or safety of All-Aboard Watersports, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

2.5 Where we will store your personal data

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. 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.

2.6 Automated decision making

We do not use automated decision making including profiling.

2.7 Retention of data

Your data is retained and cleansed in accordance with our Data Retention and Cleansing Policy which can be obtained by contacting Nicola Murdoch, Data Protection Officer, All-Aboard Watersports.

2.8 Your rights

We will only process your data for marketing purposes where you have given express consent to us to do so or where there is a legitimate interest for us to do so. The legitimate interests that we will rely on are as listed above under "Uses made of the Information – Information that we collect about you". In any event, we will only rely on legitimate interest as a grounds for processing your data where we have completed a Legitimate Interest Assessment and where such assessment supports the use of such data processing.

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. We currently disclose personal data for these purposes to the following third parties: Facebook, Twitter, Instagram, MailChimp.

At any time, even if you have previously consented, you have the right to ask us not to process your personal data for marketing purposes and/or not to disclose it to third parties for marketing purposes. You can do this by contacting us using the following email address: admin@allaboardwatersports.co.uk. You can also use this email address to notify us of any preferences you have in relation to the processing of your data for example as to the frequency of communications that you receive from us or the manner or the subject matter of such communications.

The GDPR also gives you the following rights:

- 1. to access information held about you;
- 2. to request the deletion or correction of information held about you;
- 3. to object to or restrict the processing of information about you;
- 4. to request that information about you be transferred to another person;
- 5. To complain to the relevant supervisory authority. In the UK this is the Information Commissioner's Office (ICO) https://ico.org.uk/ whose contact details are as follows:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

You can exercise these rights by contacting us using the following contact details Nicola Murdoch, CEO, All-Aboard Watersports of Baltic Wharf, Cumberland Road, Bristol, BS1 6XG.

2.9 Third Party Sites

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.

2.10 Changes to our Privacy Policy

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

2.11 Complaints Procedure

If you have any complaints in relation to how our business has processed your data or in relation to the exercise of your rights as detailed above you can in the first instance raise your concerns by contacting us as follows: Nicola Murdoch, Data Protection Officer, All-Aboard Watersports. You may also contact the Information Commissioner's Office in relation to any such complaints https://ico.org.uk/

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

2.12 Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Nicola Murdoch, CEO, All-Aboard Watersports of Baltic Wharf, Cumberland Road, Bristol, BS1 6XG or <u>admin@allaboardwatersports.co.uk</u>.

3 The internet

- 3.1 If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us Personal Data through the Website, we will normally give you the opportunity to say whether you would prefer us not to contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.
- 3.2 Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

4 Cookies

- 4.1 When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'. These cookies cannot be used to identify you personally and are used to improve services for you, for example through:
 - Letting you navigate between pages efficiently

- Enabling a service to recognise your computer so you don't have to give the same information during one task
- Recognising that you have already given a username and password so you don't need to enter it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast.

To learn more about cookies, see:

www.allaboutcookies.org

www.youronlinechoices.eu

www.google.com/policies/technologies/cookies

Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these options, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer.

Multiple cookies may be found in a single file depending on which browser you use.

4.2 The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide, as follows:

Category 3: functionality cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

The list below shows the cookies that we use, other than those that are strictly necessary to this service. If you have any queries about these, or would like more information, please contact our CEO at All-Aboard Watersports, Baltic Wharf, Cumberland Road, Bristol, BS1 6XG, or email us at <u>admin@allaboardwatersports.co.uk</u>.

Cookie name	Description
Google Analytics cookies	If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out. This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users. When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details

for future correspondence. In order to provide you with a great
experience on this site we provide the functionality to set your
preferences for how this site runs when you use it. In order to
remember your preferences we need to set cookies so that this
information can be called whenever you interact with a page is
affected by your preferences.

4.3 By using this website, you agree that we can place these types of cookies on your device.

5 Links

- 5.1 The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer Personal Data to these advertisers or third-party websites.
- 5.2 These third-party websites and advertisers, or internet advertising companies working on their behalf, sometimes use technology to send (or 'serve') the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about internet advertising companies (also called 'ad networks' or 'network advertisers'), including information about how to opt-out of their information collection.
- 5.3 We exclude all liability for loss that you may incur when using these third party websites.

6 Further Information

- 6.1 If you would like any more information or you have any comments about our Privacy Policy, please either write to our CEO at All-Aboard Watersports, Baltic Wharf, Cumberland Road, Bristol, BS1 6XG, or email us at <u>admin@allaboardwatersports.co.uk</u>.
- 6.2 We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
- 6.3 You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at <u>admin@allaboardwatersports.co.uk</u>. This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 6.4 If you would like access to the Personal Data that we hold about you, you can do this by emailing us at <u>admin@allaboardwatersports.co.uk</u> or writing to us at the address noted above. There may be a nominal charge of £10 to cover administrative costs.
- 6.5 We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please email us at <u>admin@allaboardwatersports.co.uk</u> or write to us at the address above to update your Personal Data.