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## PRIVACY NOTICE

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### BACKGROUND:

Carver Group Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our employees, customers and third party business contacts and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

Carver Group Limited.

Registered in England under company number 509127.

Registered address: 15 Northgate, Aldridge, Walsall, West Midlands, WS9 8QD.

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or

purposes.

- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. **What Personal Data Do You Collect?**

We will collect the following information from you directly or a third party such as Marketing Agencies whom you have consented to sharing your data with:

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title/Profession;
- Payment information;

Recruitment agencies, Financial Institutions and Health providers may also provide us with the following information whom you have consented to sharing your data in the process of an application for employment or provided directly by you in application for employment or as a contracted employee:

- Date of Birth
- Gender
- Medical information
- Bank account details

## 6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, or because it is in our legitimate business interests to use it.

Your personal data may be used for one of the following purposes:

- Creating a customer account and managing products and services your purchases with us.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.

- Personalising and tailoring our products and services for you.
- Communicating with you. This refers to responding to emails or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us at the address above).
- Recruitment and maintaining employment records where you have provided consent to use your personal data and/or signed a contract.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our products and services.

[Add possible consequences of not providing the personal data – as per Art 13(2)(e)]

#### Visitors to our websites

When someone visits our website ([www.widney-leisure.co.uk](http://www.widney-leisure.co.uk)) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to learn things such as the number of visitors to the various parts of the site and is done in such 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. If we do want to collect personally identifiable information through our website, we will be clear about this. We will be transparent when we collect personal information and will explain what we intend to do with it.

#### Use of cookies by **Carver Group**

You can read more about how we use cookies on our Cookies page.

#### Search engine

Our website search is powered by **WordPress**. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either **Carver Group** or any third party.

#### E-newsletter

We use a third party provider, **Indigo River**, to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter.

#### Security and performance

**Carver Group** uses a third party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the **Widney Leisure website**.

#### Facebook Advertising

We may run an advertisement through Facebook Ads. The advert aims to promote our products within a relevant sector. Information about the demographics used

Location

Age

Gender

Job titles

Additional interests

### LinkedIn Advertising

We may run an advertisement through LinkedIn Ads. The advert aims to promote our products within a relevant sector. Information about the demographics used

Location

Age

Gender

Job titles

Additional interests

### People who contact us via social media

We use a third party provider, Hootsuite to manage our social media interactions.

If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations.

### People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary to fulfil the purposes outlined in this Privacy Notice or for which it was first collected without obtaining further consent .unless a longer retention period is required or permitted by law

**8. How and Where Do You Store or Transfer My Personal Data?**

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein) e.g. Canada. For any personal data transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK & Europe and under the GDPR

**9. Do You Share My Personal Data?**

We may share your personal data with contracted third parties and other companies in our group. This includes subsidiaries.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: [contact@carver-group.co.uk](mailto:contact@carver-group.co.uk)

Postal Address: 15 Northgate, Aldridge, Walsall, West Midlands, WS9 8QD, United Kingdom.

**12. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.