# **Privacy Policy**

The purpose of this Privacy Policy is to explain how we will use any personal data we collect about you, the rights you have over any personal data we hold about you, and to tell you about the policies and procedures that we have in place to respect your privacy and keep your personal data secure.

### Regulatory Compliance

We have a duty to comply with the following national and international legislation with regards to data protection and user privacy:

UK Data Protection Act 1988 (DPA)

EU General Data Protection Regulation 2018 (GDPR)

The General Data Protection Regulation, or GDPR, is a new law in the European Union. It's set to take effect May 25, 2018.

The GDPR gives people in the EU greater control over their online data and adds new requirements for businesses that handle that data. Those requirements affect both the companies that control the data, including some Now Strike Archery, and the companies that process it, which we list in this policy under "Who do we share your data with?" ("Providers"). Our policy does not cover out providers, but you can view their specific policies on their websites, and we've linked to their policies for you in our table. That means when you make a booking with us or pay for a service, your information will be processed by them in accordance with their own privacy policy and terms and conditions.

### Who does this policy apply to?

This Privacy Policy applies to you if you attend a session promoted or organised by Now Strike Archery, purchase a voucher for one of our services, purchase one of our services, or use our products or services, over the phone, online, through our mobile applications or otherwise by using any of our websites or interacting with us on social media (our "Services").

#### Who are we?

Now Strike Archery Ltd. provides historic experiences on our own premises, at educational facilities and at events and is the parent company for Now Strike Armouries and its subsidiaries ("Our Group").

If you have any comments or questions about this Privacy Policy or our data processing practices, please address them to us at enquiries@nowstrikearchery.com or address a letter to us at The Essex Barn at Rook Hall Farm Chigborough Road Heybridge Essex CM9 4RB.

#### What information will we use?

The term personal data means any information relating to you as an identifiable individual. For example, this includes information that may of itself identify you such as your name, contact details, internet protocol ("IP") address, cookie strings or device IDs, as well as information that may not on its own identify you, but which we store alongside such identifiers, such as how you are using our services or dietary preferences for any catering we provide.

We only use your personally identifiable information where you've given us your consent, where it is necessary to deliver the services you've requested, where it's necessary to exercise or comply with legal rights or obligations, or for normal business purposes of the kind set out in this policy.

#### What do we use your data for?

We provide services including:

- Experience days
- Online shop
- Event and educational demonstrations

In order to conduct this business we need to be able to contact you about your experience, discuss your requirements and preferences and, where appropriate, take payment for our services.

### The categories of personal data we collect and use

The categories of personal data we collect and use include:

- Name
- Address
- Email address
- Telephone number
- Age and/or age range

Information about the pages or sections you have visited on the websites or mobile applications provided by us, including the pages or sections you visited, the website or mobile application you were referred from, and when you visited or used them;

Information about the Services we provide to you (including for example, what we have provided to you, when and where and, if applicable, how much you paid)

Bank account details and payment card information

Your account login details, including your user name and password if you have created them on our site or our booking system

Information you provide to us with when you contact us by phone, email, post, or when you communicate with us via social media

your vehicle registration number (when you access our site or back of house areas in a vehicle);

Information about electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication

Answers you provide when you respond to competitions, votes and surveys

Images of you from CCTV footage where we have a duty of care to our staff and customers to keep them safe and record activities carried out as part of our services

Your identity, public profile, follows and likes from a social network such as Facebook (this may include your employment or education information if you include it in your public profile)

And other personal data which you may disclose to us when you use our Services at any time.

#### Sources of personal data

We will receive your personal data when you provide them to us yourself or when you use or purchase one or more of our Services.

We also receive personal data about you from third parties. Third parties who provide us with personal data about you include:

Facebook Inc., who, if you have consented, transfer personal data to us when you register for one of our Services using your Facebook account.

We will combine any personal data about you that we receive from you, from other companies in Our Group, and from our providers and third parties.

#### How we use your personal data

All personal data that we obtain about you will be used in accordance with current data protection law and this Privacy Policy. We, or third party data processors acting on our behalf, will process your personal data as follows:

As necessary, to perform a contract with you, such as a contract to process an order from you for one or more of our Services including, where applicable, taking payment and carrying out fulfilment and delivery.

As necessary, to comply with a legal obligation, for the following purposes:

Where you exercise your rights under data protection law and make requests and to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity.

As necessary, for our legitimate interests in providing the Services and ensuring they operate safely, securely and in a commercially suitable way which is tailored to your use and interests, for the following purposes:

To provide you with the Services

To help us to ensure our customers are genuine and to prevent fraud

To ensure the security of our websites, mobile applications and other technology systems

For the good governance of our business, including keeping financial records, to allow us to pay suppliers and to charge, invoice or refund customers;

By using CCTV, to prevent and detect crime and to keep people who visit and work at our premises safe and secure

To record and investigate health and safety and other incidents which have happened or may have happened at one of our events or experiences

To provide you with information about our Services, to contact you about administrative matters, and to manage and respond to any queries or complaints you make or any correspondence you send us

To help us to return lost property to its rightful owner

To process competition entries and your survey or voting information

For the purpose of marketing our Services and goods and services from other companies, including sending marketing communications and, where applicable, processing your registration, creating custom marketing audiences on third-party websites such as Facebook, and profiling and automated decision-making relating to our marketing

To "geo-fence" marketing so that you receive marketing communications or see advertisements which are relevant to your location

To operate competitions, including notifying you if you have won, to confirm delivery of a prize or for other related purposes

For market research and statistical analysis and to analyse the use of our Services so that we can improve them.

Based on your consent, for the following purposes:

To send you marketing communications.

We may collect and aggregate on an anonymous basis information about you, your spending and use of our Services with information about other users of the Services in order to identify trends ("Aggregated Data"). We may pass Aggregated Data to the third parties referred to in the section below, such as partners, to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

#### Sharing your personal data

We will share your personal data with other companies in our group.

We will share your personal data with the data processors that help us to provide Services. Any data processors with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for any purpose other than to provide services for us. We will always ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

We will also disclose your personal data to third parties in the following circumstances:

If we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets

If we (or substantially all of our assets) are acquired by a third party, in which case personal data held by us 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, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity

In order to enforce or apply our Terms of Use or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity

To protect the rights, property, or safety of us, our customers or other persons. This may include exchanging personal data with other organisations for the purposes of fraud protection and credit risk reduction.

Save as expressly detailed above in this section, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent.

### International transfers of your personal data

Your personal data may be transferred to, and processed in a location outside of the European Economic Area (EEA).

The hosting facilities for our website/systems are situated across the UK and other countries.

Your personal data may also be processed by staff operating in the United States or outside the EEA working for us, other members of Our Group or third-party data processors. Such staff may be engaged in, among other things, the provision of our Services to you, the processing of transactions and/or the provision of support services.

Some countries outside the EEA do not have laws that protect your privacy rights as extensively as those in the United Kingdom. However, if we do transfer your personal data to other territories, we will put in place appropriate safeguards to ensure that your personal data are properly protected and processed only in accordance with this Privacy Policy. Those safeguards include imposing contractual obligations of adequacy or requiring the recipient to subscribe to or be certified with an 'international framework' of protection.

The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

## How long do we keep your personal data?

We will normally retain your personal data for as long as you use our Services and for up to five years after your last use of our Services or your last interaction with us (for example, the last time you opened an electronic communication from us or visited one of our websites).

However, in some circumstances we will retain your personal data for a shorter period, including:

We will retain recorded CCTV footage from our premises for no longer than one month, unless we are required to retain it for longer (for example, if we are investigating an incident, or have been asked to retain specific CCTV footage for a longer period by government or law enforcement officials).

We will retain your personal data for longer if we believe we may need them in order to respond to any claims, to protect our rights or the rights of a third party, and we will retain your personal data for longer if we are required to retain them in order to comply with applicable laws.

We will always retain your personal data in accordance with data protection law and never retain your personal data for longer than is necessary.

#### Your rights

You may contact us by email at enquiries@nowstrikearchery.com at any time, to:

- Request that we provide you with a copy of the personal data which we hold about you;
- Request that we update any of your personal data which are inaccurate or incomplete;
- Request that we delete any of your personal data which we are holding;
- Request that we restrict the way that we process your personal data;

- Request that we provide your personal data to you or a third-party provider of services in a structured, commonly-used and machine-readable format;
- Object to us processing personal data based on our legitimate interests, including profiling
- Object to us processing your personal data for direct marketing purposes.

Your request must include your name, email address and postal address and we may request proof of your identity. Please allow at least seven working days for us to process your request.

#### Withdrawing your consent

Where we are processing your personal data based on your consent, you may change your mind and withdraw your consent at any time.

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by adjusting the push message settings for the mobile application.

You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us at enquiries@nowstrikearchery.com.

The consequence of you withdrawing consent might be that we cannot do certain things for you.

## Right to lodge a complaint with a supervisory authority

You may also make a complaint to a supervisory authority for data protection matters. In the UK, this would be the UK Information Commissioner's Office (https://ico.org.uk/). If you live in another EEA country, you may complain to the supervisory authority in your country. Alternatively you may seek a remedy through local courts if you believe your rights have been breached.

### How do we protect your personal data?

We use industry standard technical and organisational security measures to protect your personal data. We keep your personal data secure by implementing policies, procedures and access controls so that only authorised members of our staff or authorised third parties can access your personal data. We protect our information technology systems with firewalls and anti-virus and anti-malware software and other information security technology solutions. When we transfer your personal data to third parties we use encryption.

We cannot guarantee the security of your personal data when you transmit it to us. For example, if you email us your personal data, you should be aware that email is not a secure transmission method. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to us and that any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access one of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

#### Links to other websites and mobile applications

We sometimes provide you with links to other websites or mobile applications, but these websites and mobile applications are not under our control. We are only responsible for the privacy practices and security of our Services. We are not responsible for the privacy policies, content or security of any linked websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

#### Cookies and other tracking technologies

We may use cookies and web beacons on our websites. Third parties may also view, edit, or set their own cookies or place web beacons on our websites. Cookies and web beacons allow us and third parties to distinguish you from other users of the website.

Cookies and web beacons may be used by us and third parties for the following purposes:

- To enable certain features of our websites (for example, to allow a customer to maintain a basket when they are shopping at an online store)
- To analyse the traffic to our websites (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, and use this information to improve the website)
- To help target advertisements which are more likely to be of interest to you
- To allow us carry out retargeting (this is when advertisements are presented to you for products or services which you have previously looked at on a website, but have not purchased)
- To allow you to interact with our websites on social media platforms.

The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Privacy Policy, except as required by law.

## Who do we share your data with?

Provider	Personally identifiable information we collect	What we use it for
Acuity Scheduling Our online booking system provider	Name, contact details	Scheduling experiences
Paypal A transaction processing provider	Name, contact details, credit/debit card details	Transactions to pay for our services
Stripe A transaction processing provider	Name, contact details, credit/debit card details	Transactions to pay for our services
Mailchimp Our mailing subscription provider	Name, contact details	Contacting subscribed customers with newsletters or notifications about availability and special offers.
Mobile Rocket Ltd Our mobile app provider	Name, contact details, credit/debit card details	Scheduling experiences Transactions to pay for our services Contacting subscribed customers with newsletters or notifications about availability and special offers.
Universalwebdesign.co.uk Our website host provider	ip address	Website hosting and tracking purposes (e.g. counting how many people have clicked a link)

# Changes to our Privacy Policy

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page so that we can keep you informed about how we process your personal data. We recommend that you consult this page frequently so that you are aware of our latest Privacy Policy and can update your preferences if necessary. Your continued use of our Services shall constitute your acceptance of any revised Privacy Policy.

This Privacy Policy was last updated on 19 May 2018.