

# PRIVACY POLICY

In this privacy policy we explain how we collect and use your personal information. 'We' or 'us' and our trading names, means Good Vibration Retreats. We are the data controller for the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation.

Should you wish to discuss your data in further detail, you can go to the 'Contact' page of our website to contact us with any questions you may have about privacy or data protection.

We must have a lawful basis to process your personal data, and this policy explains what our lawful basis is in respect of each purpose for which we keep and use information about you. Generally, we are allowed to process your personal data where it is necessary in connection with a contract between us (such as a contract to supply our products or services), where it is necessary in order for us to comply with our legal obligations, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

Please note that links from our website may take you to external websites not covered by this policy. We recommend that you check their privacy policies yourself before submitting any personal information. We will not be responsible for the content, function or information collection policies of these external websites.

## What information do we collect about you and how do we collect it?

You are not required (by law or by any contract with us) to provide personal information to us via this website. We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request.

Calls made to us may be recorded for training and monitoring purposes and as a record of business transactions.

Information you provide to us

We may receive personal information about you whenever you contact us. For example, by doing the following:

- Enquiring about, or applying for, job vacancies
- Enquiring about our products or services
- Using and browsing our website
- Telephoning, texting, writing by post or emailing us

This information may include the following:

- Normal identification information, such as your full name, date of birth, age, gender, marital status
- Contact information, such as your postal address, email address and telephone number
- Additional information relevant to your use of our site and services, such as GPS coordinates, your marketing preferences, survey responses and feedback.
- In respect of job applications, your CV including details of your education and employment history (and any other information which you may choose to provide to us with your CV)
- In respect of credit account applications, your bank details, references where applicable, previous addresses Information we collect about you on our website

We collect information using Cookies and other similar technologies to help distinguish you from other users of our website. These can streamline your online experience by saving you from re-inputting some information and also allow us to make improvements to our website. For more information about how and why we use Cookies please take a look through our Cookie Policy.

When you visit our website we may collect the following information:

- Which pages you view and which links you follow
- Details of the hardware and software that you are using to access the site
- Any passwords that you use on our website

Our Website is not intended for children and we do not knowingly collect data relating to children.

Information we collect about you from other sources

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Companies House, the Electoral Roll, County Court Judgements and repossessions this may include details about your home, household, vehicles, financial situation and debts.
- Information from third party databases or data suppliers, such as credit reference agencies, including details about your home, belongings and creditworthiness.
- Personal data (e.g. age) from third parties such as data and insight companies, for the purposes of identifying customers who are eligible for the Cold Weather Priority (CWP) initiative.
- Information you have shared publicly, including on social media (particularly in respect of job applications).
- If you apply for a job, we may collect information about you in order to make an informed decision which may include a DBS check and driving licence check for example.
- Your CV and other information relating to enquiries or application for job vacancies, which we may receive from other entities within the NWF group or third-party agencies.
- Information from third party companies who you have given permission to sell or share your data with, this could be product preferences.

This list is not exhaustive, and in specific instances, we may need to collect additional data for the purposes set out in this Policy.

Information we receive about you from other sources

Sometimes you will have given your consent for other websites, services or third parties to provide information to us.

This could include information we receive about you if you use any of the other websites we operate or the other services we provide, in which case we will have informed you when we collected that data if we intend to share that 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.

It could also include information from third parties that we work with to provide our products and services, such as payment processors, delivery companies, technical support companies and advertising companies. Whenever we receive information about you from these third parties, we will let you know what information we have received and how and why we intend to use it.

## **How do we use your personal information?**

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

Supplying our products and providing our services

It is necessary for us to use personal information about you to enter into and perform the contracts that we make with you, such as when you become a customer. Using your information in this context is necessary so that we can:

- Provide you with information about your contract with us
- Provide you with information about our products and services
- Verify your identity
- Deal with any complaints you may have
- Contact you about any changes that we make to our products or services
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure.

If you enquire about, or apply for, a job vacancy, it is necessary for us to use your personal information as part of the recruitment process, in order to assess your suitability for a particular role.

We may use automated decision-making and profiling to tailor the information we provide to you to your specific circumstances.

Telling you about other products or services that we think may be of interest to you

We may use your information to identify and tell you about our products or services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

We may also use your information to invite you to participate in market-research. If we do contact you about market-research, you do not have to participate. If you tell us that you do not want to receive market-research communications, we will respect this.

Whether you choose to receive marketing communications, or market-research communications is entirely up to you. You can choose to receive both, none, or just one or the other. Your choice will not affect any products or services that you have purchased from us, nor will it affect any quotes for products or services you buy in future.

You can update your preferences by using the links in any of our emails to you, or by getting in touch using the Contact Us section of the website.

Telling you about products or services that are similar to ones that you have already bought

If you have already bought a product or service from us, or you have already obtained a quote from us, we may contact you with some information about products or services that are similar.

We will only contact you by email or text message and you can choose not to receive these messages at any time. Simply follow the instructions in the message or get in touch using the Contact Us section of the website.

Making our business better

We always want to offer the best products, services and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it.

In this context, we will only use your information where it is necessary so that we can:

- Review and improve our existing products and services and develop new ones
- Review and improve the performance of our systems, processes and staff (including training)
- Improve our site to ensure that content is presented in the most effective manner for you and for your computer
- measure and understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

Contacting you

We want to stay in touch with you! Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes.

We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use the Contact Us section, and any social media posts that you tag us in
- Let you know about any important changes to our business or policies

Verifying your identity

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

Protecting you and others from harm

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality areas such as, identity theft, piracy or fraud.

We need all the categories of information listed above to allow us to enter into and perform our contract with you\*, to enable us to comply with legal obligations\*\*, and in order to pursue legitimate interests of our own or those of third parties\*\*\* (provided your interests and fundamental rights do not override those interests). The situations in which we will process your personal data are listed below. We have indicated by asterisks the purpose or purposes for which we

are processing or will process your personal information.

#### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Who do we share your personal information with?**

#### Sharing your information within our company and group

We share the information that you provide to us with our staff so that we can provide our products and services to you.

We may share the information that you provide to us with other companies within the NWF group and other websites that we operate.

#### Sharing your information with third parties

We may share your data with selected third parties. For example, where you apply for a job vacancy, we may share your information to undertake pre-employment checks.

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection, credit references and credit risk reduction
- Proportionate as part of a merger, business or asset sale. In the event that this happens we will share your information with the prospective seller or buyer involved.

## **How long do we keep your personal information?**

We will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you.

If you apply for a job vacancy (or otherwise send us your CV) we will retain your CV (and any publicly available information, for example from social media) for a period of 6 months. If we are considering you for a particular role, we may retain this information for longer than that period.

Call recordings are retained for a period of 180 days and then are automatically deleted.

In all other circumstances, we will keep your information in line with the Retention Policy/Statement currently in place.

## **How do we protect your personal information?**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We try to ensure that all information you provide to us is transferred securely via the website. 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 ac-

cess.

All information you provide to us is stored on our/third party secure servers.

## **What rights do you have in respect of your personal information?**

You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using Contact section of the website.

You have the right to access your personal data

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using
- Who we have shared the information with
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge. If you require further copies we may charge an administrative fee to cover our costs.

You have the right to correct any inaccurate or incomplete personal data

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case, you can contact us so that we can correct our records.

You have the right to be forgotten There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch using the Contact section of the website.

You have the right to have a copy of your data transferred to you or a third party in a compatible format

Also known as Data Portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly use and machine-readable format, please contact us. There is no charge for you exercising this right.

You have the right to object to direct marketing

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us or use the links provided in any of our marketing communications, and we will stop sending direct marketing immediately.

You have the right to object to us using your information for our own legitimate interests

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- When we tell you about products or services that are similar to ones that you have already bought
- When we tell you about services which may benefit you such as the Cold Weather Priority initiative
- When we use your information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please contact us.

You have the right to restrict how we use your personal data

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection
- We have used your information in an unlawful way, but you do not want us to delete your data
- We no longer need to use the information, but you need it for a legal claim

If you believe any of these situations apply, please contact us.

You have rights related to automated-decision making and profiling

Any automated decision-making or profiling we undertake is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. If you have any concerns or questions about this right, please contact us.

## **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 which may occur from time to time.

## **Complaints**

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint. Please use the 'Contact' tab on [goodvibrationretreats.com](http://goodvibrationretreats.com) website. You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the ICO website if you wish to lodge a complaint with the ICO.

Last updated: April 2023