# PRIVACY NOTICE & COOKIE POLICY

Welcome to The Textile Retreat Company privacy and cookie policy notice.

The Textile Retreat Company respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or when you otherwise provide personal data to us via other means (such as over the telephone) and tell you about your privacy rights and how the law protects you.

You can download a pdf version of the policy here.

Please use the Glossary that we have set out at the end of the Policy, if there is any terminology used in this privacy notice that you are unfamiliar with or that you don't fully understand.

### Important information and who we are

This privacy notice aims to give you information on how The Textile Retreat Company collects and processes your personal data, including any data you may provide through this website or via any other means (such as over the telephone) when you purchase our services, when you sign up to our mailing list, when you make an enquiry via our website, when you take part in a competition etc.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

Controller

The Textile Retreat Company is the controller and responsible for your personal data (collectively referred to as "TTRC", "we", "us" or "our" in this privacy notice).

# Contact details

Our full details are:

Full name of legal entity: Textile Retreat Company Limited

Contact name: Clare Bungey

Email address: clare@textileretreats.com

Postal address:3 Handel Avenue, Bristol, BS5 8DS

Mobile Telephone: 07751 698354

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues <u>(ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 8 June 2020 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change, during the course of your relationship with us.

# Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- 1. Identity Data This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- 2. Contact Data This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone numbers.
- 3. Financial Data This includes data relating to your means and methods of payment, such as your bank account and payment card details.
- 4. Transaction Data This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.
- 5. Technical Data This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- 6. Usage Data This includes information about how you use our website, products and services.
- 7. Marketing and Communications Data This includes your preferences in relation to whether or not you want to receive marketing from us and our third parties and also your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice.

# Special Categories of Personal Data

We collect the following special categories of personal data about you.

Details about your:

- Dietary requirements which may disclose your religious or philosophical beliefs
- Health
- Arrival and Departure details

We collect and process the above data only where it is strictly necessary to do so in order to deliver the creative holiday/tour service that you have purchased. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we won't be able to make the necessary arrangements to provide the services that you have booked or are attempting to book. As a result, if you do not provide your consent, we will be unable to proceed with your booking.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time. However, as this will prevent us or (where we are acting as an agent) the supplier of your chosen travel service from providing the travel service you have booked, we (or the supplier of your chosen arrangements) will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellation charges set out in our Booking Terms and Conditions will become payable.

### If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

Where we are acting as an agent and we need to collect personal data to enter you into a contract with the supplier of your chosen travel arrangements, we may not be able to take steps to enter you into that contract if you fail to provide the data when requested.

In other words, where we require details from you in order to provide you with your chosen travel services, if you do not provide us with the necessary details then we will not be able to provide (or arrange for the provision of) the services you have booked or are attempting to book.

In this case, depending upon when you fail to provide the necessary data, we may either not be able to process your booking or we may have to cancel your booking, in which case we will treat this as a 'cancellation by you' in accordance with our Booking Terms and Conditions. We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

How Your Personal Data is Collected

We use different methods to collect data from and about you including through:

- 1. Direct interactions You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - $\circ ~$  make a workshop or tour booking
  - $\circ$   $\,$  request contact from us via our website
  - $\circ$  subscribe to our mailing list
  - $\circ$   $\,$  request marketing to be sent to you
  - $\circ ~~$  enter a competition, promotion or survey; or

- give us some feedback.
- 2. Automated technologies or interactions As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy below for further details.
- 3. Third parties We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties(i) analytics providers such as Google, based outside the EU

How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to take steps to enter you into a contract with the supplier of your chosen travel services, where we are acting in an agency capacity.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data.

# Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We have established the following personal data control mechanisms:

# Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

# Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of a purchase of travel services or other such transactions.

### Monitoring communications

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

#### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy for further details.

# Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of your Personal Data

We may have to share your personal data with the parties set out below

- 1. Internal Third Parties as set out in the Glossary.
- 2. External Third Parties as set out in the Glossary.

3. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

#### Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal regulatory, tax, accounting or other requirements. We will review periodically the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or customer need for it to be retained. Should you stop interacting with us as a client, we will remove or anonymise your information after 7 years.

If you require any further details about our retention periods, you can request the same by contacting us.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- 1. Request access to your personal data.
- 2. Request correction of your personal data.
- 3. Request erasure of your personal data.
- 4. Object to processing of your personal data.
- 5. Request restriction of processing your personal data.
- 6. Request transfer of your personal data.
- 7. Right to withdraw consent.

### Glossary

#### LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### THIRD PARTIES

Internal Third Parties, Other companies associated with TTRC acting as joint controllers or processors and who are based in the UK and EEA and provide IT, service delivery and system administration services and undertake leadership reporting.

#### **External Third Parties**

(i) Suppliers of travel services acting as processors based in the country that you are travelling to and who provide the travel services that make up any booking of travel services that you make with us.

(ii) Service providers acting as processors based in the United Kingdom who provide IT and system administration services.

(iii) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

(a) if you want us to establish the data's accuracy;

(b) where our use of the data is unlawful but you do not want us to erase it;

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

# TTRC Cookie Policy

Cookies are small pieces of text sent to your browser when you visit a site. They serve a variety of functions, like enabling us to remember certain information you provide to us as you navigate between pages on the Services. We use cookies on the website for the following purposes:

Performance And Analytics. Cookies help us analyse how the Services are being accessed and used, and enable us to track performance of the Services. For example, we use cookies to determine if you viewed a page or opened an email. This helps us provide you with information that you find interesting.

Third Parties. Third Party Services may use cookies to help you sign into their services from our Services. Any such third party cookie usage is governed by the policy of the third party placing the cookie.

Opting Out. You can set your browser to not accept cookies, but this may limit your ability to use the Services. You can also opt out of receiving interest-based ads from certain ad networks<u>here</u>:

https://www.youronlinechoices.eu/ (customers in the EU)

https://optout.networkadvertising.org/?c=1 (customers outside of the EU)