



HAUORA  
AT HOME

# Privacy Policy

Last Updated July 10th 2021

## 1. Who Are We

This website [www.hauoraathome.co.uk](http://www.hauoraathome.co.uk) is operated by Hauora Wellness. (“Hauora at Home,” “we,” “us” and/or “our”). Our registered address is Hauora Wellness, 1 Armadale, Trevanion Rd PL27 7NX. You can contact us as indicated under the “Contact” section below.

The data controller responsible for your personal data is the Hauora at Home with whom you contract as a customer (“Hauora at home,” “we,” “us” and/or “our”).

## 2. What Is This Privacy Policy For

This privacy policy (“Privacy Policy”) applies to personal data that we collect from you as a user of this Site or as a customer (“you” or “your” being interpreted accordingly). It provides information on what personal data we collect, why we collect the personal data, how it is used and the lawful basis on which your personal data is processed, and what your rights are under the applicable data protection and privacy laws, including the General Data Protection Regulation (“GDPR”) which will become applicable to us and you as of 25 May 2018.

‘Personal data’ as used in this Privacy Policy means any information that relates to you from which you can be identified.

By using our Site or submitting your personal data you are taken to accept the terms of this Privacy Policy, so please read it carefully.

## 3. Personal Data We Collect

We collect the following personal data about you:

- Processing your booking. The personal details you provide when submitting a booking. This includes your name, address, e-mail address; business address and phone number; gender and date of birth and country. We also collect information about your debit/credit card and bank account information provided by you to our payment service providers, that we require for the purpose of recording and processing order. For further details please also refer to the section below headed “Payment Information”.
- Reservation Information: Guest information, such as your first and last name, email address, billing and payment information (for further details please also refer to the

section below headed “Payment Information”). Personal data collected in relation to reservations will be processed in accordance with a privacy policy provided at the time of requesting a reservation so please ensure that you read our privacy notice on the reservation website that we may provide to you when we collect or process your personal data.

- Other Information: Personal details you choose to give when corresponding with us by phone or e-mail, participating in user/customer/member surveys or otherwise visiting and interacting with this Site or any other websites we operate, and personal data that you provide to us when you visit one of our clubs or other premises. We can also combine personal data that you provide to us with other information we collect about you when you make a reservation through third-party services such as online spa-reservations, as necessary to process your requests.

## **4. Automatically Collected Personal Data**

Log Data: When you visit our Site, our servers record information (“log data”), including information that your browser automatically sends whenever you visit the Site. This log data includes your Internet Protocol (“IP”) address (from which we understand the country you are connecting from at the time you visit the Site), browser type and settings, the date and time of your request.

Our Site uses cookies (small text files placed on your device) and similar technologies to distinguish you from other users. This is to provide you with a good user experience when you browse our Site and allows us to improve its features. For detailed information on the cookies and similar technologies we use, please see our Cookie Policy

## **5. How We Use Your Personal Data**

We use your personal data in the following ways:

- To acknowledge, confirm and deal with your booking. Such use of your data is necessary in order to implement your request.
- Where you are a customer, provide you with customer services, administer your customer account and contact you regarding your use of the services. Such use is necessary to respond to or implement your request and for the performance of the contract between you and us.
- To complete and fulfill your spa reservation, for example, to process your payment and provide you with related customer service, including sending confirmations or pre-arrival messages. Such use is necessary for the performance of the contract between you and us.

- To contact you in connection with user/customer/member surveys and use any information you choose to submit in response, provided that you gave us your consent to being contacted in this way at the time you provided us with the personal data.

Hauora at Home may provide you, or permit selected third party service providers to provide you, with information about goods or services, events and other promotions we feel may interest you as a customer. We (or such third party providers) will contact you by email only with your consent, which was given at the time you provided us with the personal data.

As necessary for certain legitimate business interests, which include the following:

- where we are asked to deal with any enquiries or complaints you make.
- to administer our Site, to better understand how visitors interact with our websites and ensure that our Site is presented in the most effective manner for you and for your computer/device.
- to conduct analytics to inform our marketing strategy and enable us to enhance and personalise the experience we offer to our customer and our communications, including by creating customer profiles to enable personalised direct marketing communications.
- to provide postal communications which we think will be of interest to you.
- if you ask us to delete your data or to be removed from our marketing lists and we are required to fulfil your request, to keep basic data to identify you and prevent further unwanted processing.
- we may anonymise, aggregate and de-identify the data that we collect and use such anonymised, aggregated and de-identified data for our own internal business purposes, including sharing it with our current and prospective customers, business partners, agents and other third parties for commercial, statistical and market research purposes, for example to allow those parties to analyse patterns among groups of people, and conducting research on demographics, interests and behaviour.
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site, network and information systems secure.
- to (a) comply with legal obligations, (b) respond to requests from competent authorities; (c) protect our operations; (d) protect our rights, safety or property, you or others; and (e) enforcing or defending legal rights or preventing damage.

We may use your personal data for other purposes which you have consented to at the time of providing your data.

## **6. Disclosure Of Your Information**

We collect the following personal data about you:

- Service Providers: Hauora at Home, like many businesses, sometimes hires selected third parties who act on our behalf to support our operations, such as (i) card processing or payment services (see the section below headed “Payment Information”), (ii) credit reference agencies to protect against possible fraud, (iii) IT suppliers and contractors (e.g. data hosting providers or delivery partners) as necessary to provide IT support and enable us to provide customer services and other goods/services available on this Site or to customers, (iv) web analytics providers, (v) providers of digital advertising services and (vi) providers of CRM, marketing and sales software solutions. Pursuant to our instructions, these parties may access, process or store your personal data in the course of performing their duties to us and solely in order to perform the services we have hired them to provide.
- Business Transfers: if we sell our business or our company assets are acquired by a third party personal data held by us about our customers may be one of the transferred assets.

We share your personal data with third parties in the following situations:

- Administrative and Legal Reasons: if we need to disclose your personal data (i) to comply with a legal obligation and/or judicial or regulatory proceedings, a court order or other legal process. (ii) to enforce our Terms & Conditions or other applicable contract terms that you are subject to or (iii) to protect us, our customers, or contractors against loss or damage. This may include (without limit) exchanging information with the police, courts or law enforcement organisations.

## 7. Payment Information

Any credit/debit card payments and other payments you make through our Site will be processed by our third party payment providers and the payment data you submit will be securely stored and encrypted by our payment service providers using up to date industry standards. Please note that we do not ourselves directly process or store the debit/credit card data that you submit.

We may arrange that card or payment data you submit in support of an order is stored for the purpose of processing your order.

We store and use this card or payment information for the purpose of processing any future payments that you make as a customer for additional goods and services. We will store this data in accordance with our legal obligations under applicable law and only for so long as legally permitted.

You may choose to opt out of us holding your card or payment data although this means that you will need to re-supply us with card/payment details to for the purpose of making any future purchases.

## **8. Security**

Where we have given you (or where you have chosen) a password or log-in which enables you to access certain restricted parts of our Site, you are responsible for doing everything you reasonably can to keep these details secret. You must not share your password or log-in details with anyone else.

Unfortunately, the transmission of information over the internet or public communications networks can never be completely secure. We will take appropriate technical and organisational security measures to protect the personal data that you submit to us against unauthorised/unlawful access or loss, destruction or damage, although we cannot 100% guarantee the security of personal data that you provide to us online.

## **9. Personal Data Retention**

We will keep your personal data only for as long as is reasonably necessary for the purposes outlined in this Privacy Policy, or for the duration required by any legal, regulatory, accounting or reporting requirements, whichever is the longer. We retain information submitted through the Site and the other websites we operate for two years following account closure or contact with you, as applicable. When you consent to receive marketing communications, we will keep your data until you unsubscribe.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data, applicable legal requirements or operational retention needs, and whether we can achieve those purposes through other means.

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

## **10. Your Personal Data Protection Rights**

Certain applicable data protection laws give you specific rights in relation to your personal data. In particular, if the processing of your personal data is subject to the GDPR, you have the following rights in relation to your personal data:

**Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details such as the purpose of the data processing. If you require additional copies, we may need to charge a reasonable fee.

**Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

**Right to erasure:** You may ask us to delete or remove your personal data, such as where our legal basis for the processing is your consent and you withdraw consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data with so you can contact them directly. We may continue processing personal data where this is necessary for a legitimate interest in doing so, as described in this Privacy Policy.

**Right to restrict processing:** You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the personal data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.

**Right to data portability:** You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will provide you with your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

**Right to object:** You may ask us at any time to stop processing your personal data, and we will do so:

- If we are relying on a legitimate interest to process your personal data — unless we demonstrate compelling legitimate grounds for the processing or,
- If we are processing your personal data for direct marketing.

**Right to withdraw consent:** If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent.

**Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the UK

data protection authority (the Information Commissioner's Office or ICO), or, as the case may be, any other competent data protection authority of an EU member state that is authorised to hear those concerns (you may find EU Data Protection Authorities' contact information [here](#)).

If you wish to exercise any of these rights please contact us as described in the "Contact" section below. We may also need to ask you for further information to verify your identity before we can respond to any request.

## **11. Changes To Our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or modifications. If required by the applicable law, we will notify you of any material or substantive changes to this Privacy Policy.

## **12. Contact**

Questions, comments or requests regarding this Privacy Policy should be addressed to [hello@hauoraathome.co.uk](mailto:hello@hauoraathome.co.uk)