

Privacy Notice

This site is powered by HPCPORTAL, trading name of Castle Moda Limited trading as HPCPORTAL incorporated under English law with company registration number 10237766 with registered office at 2 Stafford Place, Weston-Super-Mare, Somerset, United Kingdom, BS23 2QZ ("HPCPORTAL.com") (**We, Us, Our**), which is committed to preserving the privacy of all visitors to Our websites as well as vendor and collaborator websites..

This notice describes how We collect and use Personal Data about you, in accordance with the General Data Protection Regulation (**GDPR**) and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK including the Data Protection Act, 2018 (together "Data Protection Legislation").

For the purpose of the Data Protection Legislation, We are the data controller. This means that We are responsible for deciding how We hold and use Personal Data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

"Personal Data" means any information relating to an identified or identifiable individual

"Vendor" is a person or company from whom it may be possible to acquire services or goods through Our website and booking engine.

Cookies:

Cookies are small text files placed on Your computer, tablet or mobile device by websites including this website, they help Us deliver Our services to you. By using Our services, you agree to Our use of cookies..

Information that We collect from you:

When you visit, register or order products or services on this website and its booking engine you may be asked to provide certain information about yourself for example to us or to a Vendor:

- Contact Data including your name and contact information, including email address and telephone number and company details
- Identity Data including information to enable Us to check and verify your identity, e.g. your full name, title, date of birth and gender and car registration number
- Financial Data including your billing information, transaction and payment card information, we do not see the card information
- Profile Data including your contact history, purchase history and saved items and your responses to surveys, competitions and promotions your personal or professional interests and information about you from messages you post to the website and e-mails or letters you send to Us
- Transaction Data Details of transactions you carry out through Our website and of the fulfilment of your orders, .
- Technical Data information about how you use Our website, IT, communication and other systems
- Marketing and Communications Data including your preferences in receiving marketing from Us and your communication preferences

This Personal Data is required to provide products and/or services to you. If you do not provide Personal Data We or a Vendor asks for, it may delay or prevent Us or the Vendor from providing products and/or services to you.

How your Personal Data is collected

We collect most of this Personal Data directly from you—in person, by telephone, text or email and/or via Our website and booking engine. However, We may also collect information:

- directly from a third party
- from a third party with your consent, e.g. your bank or building society;
- via Our IT systems
- automated monitoring of Our websites and other technical systems, such as Our computer networks and connections, and access control systems, communications systems, email and instant messaging systems;

Any Personal Data which is not obtained directly from you will also be processed in a manner which is compliant with this privacy notice.

How and why We use your Personal Data

Under data protection law, We can only use your Personal Data if We have a proper reason for doing so, eg:

- to comply with Our legal and regulatory obligations;
- for the performance of Our contract with you or to take steps at your request before entering into a contract;
- for Our legitimate interests or those of a third party; or
- where you have given consent; and you agree that by completing a booking with a Vendor or submitting an enquiry through Our website or booking engine you have consented to Our processing your Personal Data for that purpose and to relevant parts of your Personal Data being transferred to the Vendor concerned.
- A legitimate interest is when We have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what We use (process) your Personal Data for and Our reasons for doing so:

What We use your Personal Data for	Type of Data	Our reasons
To provide products and/or services to you or to facilitate the provision of products and or services particularly accommodation by a Vendor	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Financial	For the performance of Our contract with you or to take steps at your request before entering into a contract or to facilitate you contracting with a Vendor
To prevent and detect fraud against you and for the security of the overall site	(a) Identity (b) Contact (c) Financial (d) Transaction	For Our legitimate interests or those of a third party, e.g.: to minimise fraud that could be damaging for Us and for you
Conducting checks to identify Our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to Our business, eg under health and safety regulation or rules issued by Our professional regulator	(a) Identity (b) Contact (c) Profile (d) Financial	To comply with Our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	(a) Identity (b) Contact (c) Usage (d) Marketing and communication	To comply with Our legal and regulatory obligations

What We use your Personal Data for	Type of Data	Our reasons
	(e) Transaction	
Ensuring business policies are adhered to, eg policies covering security and internet use	(a) Identity (b) Contact (c) Technical	For Our legitimate interests or those of a third party, ie to make sure We are following Our own internal procedures so We can deliver the best service to you
Operational reasons, such as managing entry, improving efficiency, training and quality control of Our services	(a) Contact (b) Identity (c) Technical	For Our legitimate interests or those of a third party, i.e. to be as efficient as We can so We can delivery the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	(a) Identity (b) Contact (c) Transaction (d) Technical	For Our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information To comply with Our legal and regulatory obligations
Statistical analysis to help Us manage Our business, eg in relation to Our financial performance, customer base, product range or other efficiency measures	(a) Identity (b) Contact (c) Financial (d) Marketing and communications (e) Technical	For Our legitimate interests or those of a third party, ie to be as efficient as We can so We can delivery the best service for you at the best price
Preventing unauthorised access and modifications to systems	(a) Identity (b) Contact (c) Profile (d) Technical	For Our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for Us and for you. To comply with Our legal and regulatory obligations
Updating and enhancing customer records	(a) Identity (b) Contact (c) Profile	For the performance of Our contract with you or to take steps at your request before entering into a contract To comply with Our legal and regulatory obligations For Our legitimate interests or those of a third party, eg making sure that We can keep in touch with Our customers about existing orders and new products
Statutory returns	(a) Identity (b) Contact	To comply with Our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	(a) Identity (b) Contact	To comply with Our legal and regulatory obligations For Our legitimate interests or those of a third party, eg to make sure We are following Our own internal procedures and working efficiently so We can deliver the best service to you
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of Our accounts	(a) Identity (b) Contact	For Our legitimate interests or a those of a third party, ie to maintain Our accreditations so We can demonstrate We operate at the highest standards To comply with Our legal and regulatory obligations
To take proceedings against you or otherwise to instruct third parties to act for Us in recovering debt or exercising Our rights	(a) Identity (b) Contact (c) Financial	So that We may be paid or otherwise enforce your obligations under Our out Our legitimate interest

The above table does not apply to special category Personal Data, which We will only process with your explicit consent.

Disclosure of your Information:

- Neither We nor any Vendor or collaborator will retain or have access to any of your credit or debit card information.
- The information you provide to Us may be accessed/processed by Us, the Vendor which you book with, parties who process information for the purpose of, fulfilling and delivering your orders including your booking, process credit card payments and provide support and technical services on Our behalf.
- We may also pass aggregate information on the usage of Our website to third parties but this will not include information that can be used to identify you; that is no Personal Data.
- If Our business enters into a joint venture with or is sold to or merged with another business entity, your Personal Data may be disclosed to Our new business partners or owners.
- Unless required to do so by law, We will not otherwise share, exchange sell or distribute any of the information you provide to Us without your consent.

Where We store your Personal Data:

All information you provide to Us is stored on Our secure servers or the secure servers of Our trusted third party software and service providers (including credit or debit card information which We do not store). Any payment transactions, user logins and passwords are encrypted. Where We have given You (or where You have chosen) a password which enables you to access certain parts of Our website or booking engine, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. 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 use strict procedures and security features to prevent unauthorised access.

Security and Data Retention:

We employ commercially reasonable and appropriate security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. In addition, where We share your Personal Data with a "data processor" for the purposes of the Data Protection Legislation, 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.

Generally, we will keep your Personal Data while you have an account with us or we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it. For customers who have booked through Our websites, We will delete your Personal Data entered during the booking process from Our systems after 7 years unless you have previously requested deletion in line with your Rights (see below).

(a) For customers who create a login, We will retain your information relating to your username and password on Our secure servers for an unlimited period (this is because you may wish to login to Our websites at any time to make another booking, update your Personal Data, or access your historic booking data) unless you have request deletion in line with your Rights (see below).

(b) For customer communications, We will retain your data and communications for up to three years for the purposes of an audit trail in case of future disputes, but you will not be added to a distribution list for marketing purposes unless you have opted in to such communications.

(c) If you are a Vendor and no longer wish for your Personal Data to be stored on Our servers, you can delete your name, personal email address and phone number via Our admin system.

(d) If you are a Vendor and wish your profile to be removed from Our websites, this will be done according to the terms of Our agreement with you. If you have no outstanding bookings, We will delete your Personal Data within 30 days.

(e) If We approach you because We believe you may be interested in Our services, We will not store any of your Personal Data until such time that you opt-in.

Your Rights:

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
To withdraw consent	The right to withdraw your consent at any time by following the steps outlined below. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: <ul style="list-style-type: none"> • at any time to your personal information being processed for direct marketing (including profiling); • in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

email or write to us or our Data Protection Officer—see below: '**How to contact us**'; and let us have enough information to identify you:

- (e.g.: your full name, address and customer or gym reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

How to complain

We hope that Our Data Protection Officer can resolve any query or concern you may raise about Our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on and last updated on 28 June 2019.

We may change this privacy notice from time to time—when We do We will inform you via Our website or other means of contact such as email.

How to contact Us

Please contact Us and/or Our Data Protection Officer by post, or by email if you have any questions about this privacy notice or the information We hold about you.

Our Data Protection Officer Contact Details
Sarah Harding
The Data Protection Officer,
Castle Moda Limited
at the address below, or
Email address:

Our contact details are shown below:

HPCPORTAL is a trading name of Castle Moda Limited incorporated under English law with company registration number 10237766 with registered office at 2 Stafford Place, Weston-Super-Mare, Somerset, United Kingdom, BS23 2QZ ("HPCPORTAL.com")