# **OUR PRIVACY POLICY**

Here's a brief overview of how we collect and manage your personal information and what control you have over it.

### What information we collect and why

We will only collect the information we need to answer your questions, provide you with the advice or service you want from us, and with your permission, to send you information we think you'll find interesting.

# We need your details to do our job

As a Customer the information you give us makes it possible to carry out the agreement we made with you when you signed a contract with us, as well as helping us meet our legal obligations.

# Sharing your personal information

To provide our services to you, your details may be shared with other companies in our group, as well as external suppliers, credit reference agencies, third parties and crime prevention organisations, but only when this is necessary.

# How long we take care of your information

We hold on to your details for as long as you have are a customer with us, and for six years after your leave us. This is so that we can easily handle and respond to any future questions or claims.

# You are always in control

You have the right to ask to see what information we have about you. This is known as a 'subject access request'

# Don't fancy hearing from us?

Then just let us know, and you will not receive marketing from us again.

#### Information we collect about you

We may collect information about you in a variety of situations. In each case, we will only collect the information that we need to provide you with our services.

For example, if you contact us to ask about our products and services, we may ask you for your name and phone number. If you want to enter into a contract with us, we will need to know more information about you, such as your address for correspondence. If you apply for profit share or rental, we will need to know more about your preferred payment method.

This section of our privacy policy explains more about:

- information you give to us (for example, when you apply for profit share/rental);
- information about you that we get from others;
- information about your health and personal circumstances; and
- information that we automatically collect when you use our sunbeds.

#### How long we will keep your information

We will generally hold your information for the whole time you have an account or a

business relationship with us, and then for up to six years after your account is closed.

We may securely keep information about credit card payments for up to four years. This helps us to manage our regulatory requirements.

If you only enquire about our services and don't open an account, we may keep your

information for twelve months.

We may keep information for a longer period if this is necessary in connection with your or our right to establish, start or defend legal claims, to investigate complaints, or to protect our business.

#### Information you give us

When we collect it from you	What we collect	Why we collect it
When you:- Open a contract	name address and	To set up and manage your
with us	telephone number	contract
Make a payment to us	Payment details	To meet regulations on how we use your data
Register on our website	Email address	If we do not have the information we may not be able to offer you our services
When you enquire on line or by email	We will collect contact details and anything relevant to the enquiry	To help us deal with the enquiry and arrange an appointment if necessary
If you visit our premises	We have CCTV at our premises, which may capture images of you, and there are notices informing you of the recordings. This is normally kept for 30 days, normally for the purposes of criminal proceedings or to detect a crime	To prevent and detect crime and to protect the health and safety of our staff and customers
If you make a complaint or a claim against us.	We will collect your name and contact details, together with information about your complaint or claim.	To help us investigate and settle your complaint and, if necessary, defend ourselves against the claim.
If you give us any information through social media (such as our Facebook page)	We will keep the information that you give us, but we do not encourage you to provide personal information through social media	To deal with your enquiry

y sometimes need to record and process information about your health or personal circumstances, even if you have not given us permission, so that we can meet our obligations to identify customers who need specialist support. We will only do this if we believe that it is in your best interests or the public's best interests. We will generally hold this information as long as we have your permission, or while we need it to provide the extra help you may need, and

then for six years after your contract has ended, or you cease to use our provisions.

We understand that this type of information is particularly sensitive so we will make sure that it is held securely, and only used to provide you with the support you need.

#### Information we automatically collect when you visit our website

When you visit our website, we automatically collect the following information:

• Technical information, including the MAC address, IP address used to connect your

computer to the internet, your log-in information (if you log-in), mobile-phone location, browser type and version, time zone, browser plug-in types and versions, operating system and platform.

• Information about your visit, including the URLs you have clicked on (including date

and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), methods used to browse away from the page, and any phone number used to call us.

We use this information to maintain and improve our services and our site. The information can also be used to help us protect your information and our business, by preventing financial crime.

#### Information we automatically collect when you receive an email from us

• Your operating system and 'behavioural' information (for example, whether you have read the email, opened the email and clicked on any links in the email).

We use this information to better understand your needs and interests, deal with your requests, improve our services and to personalise your experience. You can choose to 'opt out' of getting marketing emails from us by clicking the unsubscribe link within the email.

## How we use your information

We will use your information to manage your account, provide a service, keep you updated and monitor communications. In more detail, we will use this information to do the following.

• Confirm your identity, update and correct our customer records, tell you about changes to our service.

• Help trace people who owe us money, recover debt, and prevent financial crime (including fraud or money laundering).

• Make sure that content on our website is presented in the most effective way for you and for your device.

• Improve our products, services and website by carrying out internal research, analysing trends and assessing the characteristics of our customers. This may include marketing and exercises to compare ourselves to other businesses. Your personal information may be converted into statistical information which cannot be used to identify you, and then used to produce statistical research and reports. Such information may be shared and used in all the ways described in this policy.

• Help us test and improve our systems and manage our site and for internal purposes, including troubleshooting, analysing information, testing, research, statistical and survey purposes, as part of our efforts to keep our site safe and secure.

• Monitor and report on our obligations and our procedures to keep our business safe.

• Measure or understand the effectiveness of our advertising.

• Meet regulations on monitoring and recording calls, emails, text messages, social-media messages, secure messages and other communications. This information is used to help prevent or detect crime, protect the security of our systems, check your instructions, investigate disputes, perform quality control, and help staff training. In specific circumstances monitoring may increase, particularly if this is necessary for our legitimate interests or to keep to any law or regulation (for example, if we suspect fraud or any other crime, including money laundering).

Let you know about other relevant products and services, from us and other organisations whose products and services we have agreed should be made available to you. (Please see the section on 'Using your information to keep in touch with you' for more information about this.)

# Using your information to keep In-touch with you.

We may use the information we hold about you to send you information about products and services offered by us.

If we contact you with direct marketing, it is because we think it is in your and our interests for you to receive information about the products and services or because you have asked for the information. We will let you know we are going to do this, and won't send you any direct marketing if you choose not to receive it. Similarly, if you've chosen to receive direct marketing in a certain way (for example, by phone, text message or email), we'll meet your request.

# Who we may share your information with

Suppliers we use to process information on our behalf or to provide our services to you (for example, to carry out payments on your card transactions for us, or help us recover overdue payments). We only use reputable companies and always make sure that they meet our strict security requirements.

Other organisations that are entitled to receive your information for the purposes of

preventing crime and meeting legal and regulatory requirements. This may include

fraud-prevention agencies, intelligence-sharing forums, the police HM Revenue & Customs, and other regulatory bodies.

#### Preventing and detecting fraud

Before we provide services, we carry out checks for the purposes of preventing financial crime, including fraud and money laundering, and to check your identity. For these checks, we need to process personal information about you. We may do this before or while providing services. We do this to protect ourselves against fraud or other crime, to check your identity, to use our 'legitimate interests' to prevent fraud and money laundering, and to keep to laws that apply to us.

If you give us false or inaccurate information, or we discover any fraud, we will pass the details to fraud-prevention agencies. Law-enforcement agencies (such as the police and the Crown Prosecution Service) may gather and use this information to detect, investigate and prevent crime. It is vital that you always give us accurate information.

If we, or a fraud-prevention agency, believe that you pose a fraud or moneylaundering risk, we may refuse to provide the services you have asked for or stop providing existing services to you.

If you fall behind with your repayments to us, this will be recorded with creditreference agencies. The details will stay on your credit record for a period of six years. Debt-recovery proceedings may also become necessary in situations other than when repayments are not made in full. If such a situation arises, we will give you the opportunity to repay the debt before we take you to court. If we take legal action against you, we will usually need to give your information to the court and other third parties who are involved in the legal proceedings.

# Our 'legal bases' for processing your information

Data-protection law sets out various lawful legal bases (or conditions) which allow us to process your personal information.

• We will sometimes process your personal information based upon your permission. We will always tell you when this is the case, and will ask you to agree before we process your information under this condition.

• If you have a contract with us, we need to process your personal information so that we can meet our contractual obligations to you.

• We need to process your personal information to meet various legal and regulatory obligations. These include anti-money laundering and fraud-prevention obligations

### Your rights

You have the right to ask to see the personal information we hold about you. This is sometimes known as a 'subject access request'. If you think that any of the information we hold about you is wrong, you can ask us to correct it.

From 25th May 2018, you will also have the right to ask us to:

- delete information about you (in certain situations);
- stop using your personal information for certain purposes

Many of your rights listed above are limited to certain circumstances and we may not always be able to meet your request. We will tell you if this is the case.

If you make a request to exercise any of your rights set out above, we aim to respond to you within one month. We will not charge a fee for dealing with your request.

### Changes to this privacy policy

Please check frequently to see any updates or changes.