Privacy policy

We are committed to safeguarding your privacy. This policy explains how we do that. We are also committed to plain English! So the policy should be read in full for a complete understanding of what we collect, how we collect it, how we store it and how we use it.

1. What kind of data do we collect?

We may collect any of the following types of personal information from you during our normal course of business.

- 1.1. Name
- 1.2. Telephone number
- 1.3. Email address
- 1.4. Visit dates
- 1.5. Purchase data
- 1.6. Credit card data

2. How do we collect it?

There are various ways we can collect your data. These are:

2.1. Directly and specifically.

You give us your data intentionally for the purpose of us marketing to you.

IE. You know what data you're giving us and what it is being used for.

The only ways we currently do this are:

- 2.1.1. Via our website subscription form
- 2.1.2. Via our Facebook subscribe button.
- 2.1.3. Via competitions or promotions that specify some types of personal data for the *sole purpose* of the competition.

2.2. Directly but non-specifically

You give us your data but not necessarily for any specific purpose.

IE. You know what data you're giving us but may not know what it is being used for.

The only ways we currently do this are:

- 2.2.1. If you sign up to become a member of The Square
- 2.2.2. If you book a party we take basic contact details

2.3. Indirectly

We receive your data as part of normal business procedures.

IE. You may not be aware that we are receiving it or what it is used for.

The only ways we currently do this are:

- 2.3.1. If you use your credit card, we get a slip that may contain part of your card details
- 2.3.2. Once you are a member, our tills may log visit dates and purchase data.
- 2.3.3. If you use our broadband, it collects some data about you.

3. How do we store your data?

We have limited ways of storing your data. These are:

- 3.1. Directly, on our tills
- 3.2. Directly, on off-site computers (IE. An online database software provider)
- 3.3. Indirectly, on off-site computers (IE. WalkinWifi's servers)
- 3.4. Directly, in our party-booking diary (hard copy)

Note, we do not store credit card slips, they are destroyed as soon as is reasonably practicable. We do not store any data for longer than is reasonably required, and all data relating to paragraph 2.1 can be deleted at any time by you, via the unsubscribe options given each time we communicate with you.

4. How do we use your data?

We now deal with the specifics of how all of the above is used in reality, for your peace of mind. We only ever use your data in the following ways.

- 4.1. To communicate with you or market to you for business purposes.

 This would only ever involve your name, email or telephone number and would use only data collected as stated in paragraph 2.1, which has your *direct consent* to use it for such marketing or communication purposes.
- 4.2. To get in touch with you for a specific reason

This would only ever involve your name, email or telephone number and could use data collected as stated in paragraphs 2.1 or 2.2. But this is only for a specific, personal reason that might not necessarily require your direct consent each time, only your implied consent. For example, if you left behind a personal item and we needed to notify you about it, it is reasonably implied that if we hold any contact details for you (EG. you're also a member), you would not mind us contacting you about it. Or if you had a party booked and we needed to contact you about it, it is reasonably implied that if you have given your telephone number, you would not mind us calling you about it.

4.3. For general business or admin purposes.

This could use any of the data collected as stated in paragraphs 2.1, 2.2 or 2.3 but would only be for internal, general business purposes and admin. For example, we may use a member's last visit date for the purposes of reviewing membership status. Or we may use purchase data for reviewing products or pricing.

Note, we do not store or use credit card data, card slips are destroyed as soon as is reasonably practicable.

Also note, whilst we have the *ability* to use your broadband data for marketing purposes, we never will, as we use our own database using only data from paragraph 2.1. And that broadband data cannot be seen by us, it can only be used indirectly via a third party (WalkinWifi) who also have all the same legal obligations for your privacy regarding that data. For any concerns about your broadband data, you should see WalkinWifi's own

privacy policies, details of which will be given to you when you sign up to their service.

5. Security of your data?

Data held on our database for the purposes of the use given in paragraph 4.1 can be accessed by the company director only.

Data held on our tills, for the uses mentioned in paragraphs 4.2 and 4.3 can be accessed by the director and staff only.

Regarding the general physical security of your data, our whole site is as secure as could reasonably be expected. Data held on site is always held in either a secure location (for physical hard copy data) or in a password-protected or limited access location (for electronic data), or both.

6. Sharing your data with others

- **6.1.** We do not share your data with any other party for the purposes of them using it themselves. We only 'share' your data in the sense that it may be held on secure third-party software for our own purposes (EG. a MailChimp database). No other party has any control over your data, access to it or right to use it, either implied or otherwise from us. We respect your privacy and would never share, sell or in any other way pass on your data.
- **6.2.** The only exceptions to this would be any official persons or bodies requesting your data who have a legal right to do so, such as the police.
- **6.3.** Third parties may have access to your data due to your interaction with us via other means out of our control. For example, if you contact us via our Facebook page with any personal information, we cannot be responsible for anything Facebook might do with that information.

7. Alterations

7.1. We may update this policy from time to time by publishing a new version on our website, so you should check this page occasionally to ensure you are happy with any changes to this policy. We may notify you of changes to this policy by email or other means, but you agree that we are not obliged to do so.

8. Your rights

8.1. You may instruct us to provide you with any personal information we hold about you; provision of such information will be free of charge so long as the request is deemed to be reasonable and you provide evidence of your identity.

- 8.2. You may instruct us at any time not to process your personal information for marketing purposes.
- **8.3.** Third parties may sometimes be linked to our business by means over which we have no control (EG. web links), so we are not in any way responsible for the privacy policies of such third parties.

9. Other information

This business (The Square) and its website is owned and operated by *Play Wells Ltd*.

Our registered address is: *20 Priory Rd, Wells, Somerset, BA5 1SY*.

We are registered in England and Wales under business registration number: *8792970*

You can contact us by writing to the address shown above, by email to play@thesquarewells.com, by telephone on 01749 677 510 or by using any of the other methods mentioned on the 'contact' page of our website.

