

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, either during the booking process or 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 online booking system
- 2.1.2. Via our website subscription form
- 2.1.3. Via our Facebook subscribe button.
- 2.1.4. 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

2.3. 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 may have access to basic details (not enough to allow us to perform any functions with your card)
- 2.3.2. Once you are a member, our tills may log visit dates and purchase data.

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, third-party computers (IE. Our database software provider or our booking/payment gateway provider)
- 3.3. Temporarily, on a manually-printed daily guest list (shredded each day)

Note, we do not store credit card slips, they are no longer automatically printed.

We do not store any data for longer than is reasonably or legally required, and all data relating to paragraph 2.1 can be deleted at any time. For marketing communications you can do this yourself via the 'unsubscribe' option included in all of our communication. For sales data held on third-party software (such as our online booking system) you can ask us to have your data removed, although this will require you to re-input all of your data each time you book with us.

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 data collected as stated in paragraph 2.1, 2.2 or 2.3. You would always have a clear unsubscribe option included with any such communication. However, any such unsubscribe option would only remove you from our marketing database, your data may still be held for other reasons if was gathered as in paragraphs 2.2 or 2.3 (for example, on our booking system)
- 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, 2.2 or 2.3. 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, any card slips are destroyed as soon as is reasonably practicable, and they are no longer printed automatically by our terminals. Our online payment gateway provider will store your card data under their own GDPR rules and we have only very limited access to the most basic details.

5. **Physical and Cyber Security of your data?**

Cyber security encompasses all aspects of where your data could possibly be compromised, and we take our commitment to this seriously. So, as well as the specific points mentioned in this document, you can be assured that everything we do falls into a permanent company ethos that ensures physical and cyber security measures.

5.1. Physical

5.1.1. Our physical premises are always locked when not in use. We have a full CCTV system in place and our data controller also lives on site (in a separate residential area but part of the same building).

5.1.2. Any physical system holding your data (computer, till, filing cabinet, etc) will always require a password for access and/or be locked in a secure area

5.2. Cyber

5.2.1. Data held on our own systems will always have limited access based on operational needs. For example, data held on our database for the purposes of the use given in paragraph 4.1 can be accessed by the data controller only. Data held on our tills, for the uses mentioned in paragraphs 4.2 and 4.3 can be accessed by the data controller and staff only.

5.2.2. Any cyber system we use internally, as well as being of limited access, will always be of a professional quality and protected by some form of proprietary anti-malware software.

5.2.3. Any cyber system we use externally or via a third party (for example: website, booking system, database provider, credit card providers) will always involve only reputable, professional companies/individuals who can show a proven track-record and commitment to cyber security.

5.2.4. We use only one cloud-based storage system for back-up files, which is a world-leader in secure storage.

5.2.5. Our internal network is secure.

5.2.6. We are also conscious of any "internet of things" indirect access to our network and review any new device before its use.

6. **In the event of a cyber-attack?**

Given the limited data & equipment we hold as a business, we are very unlikely to be victims of a cyber-attack. Our response will also very much depend on the severity (what data is at risk) and the type of attack, but should one occur we will follow five key steps:

- 6.1. Identify the attack quickly and initiate suitable first-stop measures, dependant on the threat (such as disconnection of wifi, changing of login passwords, etc).
- 6.2. Involve professionals where required, either for tracking or advice on the best way to proceed (such as calling our ISP), or to ensure they are taking immediate action if the threat is via their service to us (such as our cloud storage or payment gateway providers)
- 6.3. Ensure the threat has been stopped and/or removed and take actions to guarantee this.
- 6.4. Be honest with you, if the attack has resulted in any breach of your data
- 6.5. Assess what has happened and put in place long-term actions to ensure it cannot happen again

7. Sharing your data with others

- 7.1. 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. Our email 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.
- 7.2. 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.
- 7.3. 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.

8. Alterations

- 8.1. 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.

9. Your rights

- 9.1. 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.

9.2. You may instruct us at any time not to process your personal information for marketing purposes.

9.3. 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.

10. 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.

