

## Privacy Notice

Thank you for taking the time to visit Hunter & Gold's website to review our Privacy Notice. At Hunter & Gold Ltd. (company registration number: 08581876 and registered office address of 37 Shepherd Street, London W1J 7JL) (throughout this notice referred to as 'HG, We, Us, Our') we are committed to protecting the privacy rights of all our customers. The goal of this Privacy Notice is to explain to you in plain language what personal information or data HG collects from you and why, how we handle and protect Personal Information ('PI'), and how to exercise your privacy rights and choices.

PI is any information that identifies you, can authenticate you and can be linked to your transactions, behaviours or preferences. Through your activities in our venues or on our websites and mobile app you may provide us PI such as your full name, contact details, financial details, date of birth, username and password amongst others. These are just a few examples so please review our Privacy Notice in detail and let us know if you have any questions.

This Notice applies to use of any group venues, the websites located at [huntergold.com](http://huntergold.com), [arclesalon.com](http://arclesalon.com) and the HG mobile application. Websites and the mobile application which are owned by HG may contain links to websites that are owned and operated by other companies. This Privacy Notice does not apply to the websites and services that are owned and operated by third parties. When referring to 'your device' through this Privacy Notice, this should be read to mean any computer, tablet, smart phone or other digital device that you are using to access any of our services.

This Privacy Notice went into effect on the date noted at the bottom of this page. We may update this from time to time but if we do make material changes, we will post the updated Privacy Notice on this page changing the date on the bottom of this webpage. We encourage you to look for updates and changes to by checking this date when you access our websites and mobile application. We will inform you of any changes to this Privacy Notice that could materially affect the way we use or disclose your personal information before this change becomes effective.

### **What information we collect**

We collect and process the following information:

Your name, image, address, date of birth, information to enable us to check and verify your identity, location information, demographic information (such as your gender or nationality), contact information (such as your email address or telephone number), your billing information such as transaction payment card and bank account details, CCTV footage, correspondence between yourself and ourselves, device information, information about how you use our website, HG mobile application IT communication and other systems, search history, your responses to surveys competitions and promotions, order history and product preferences as well as any other information that you give us. You may also provide us information about other people (for example when bringing guests to one of our venues or when purchasing a gift card).

This personal information is required to provide products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and services to you.

## **How we collect your information**

We collect your information through your use of our websites and mobile application as well as through the inputting of your information on devices within our venues.

**Personal Details and Demographic Information** – this is collected upon registration to one of our customer programs. This can include your name, image, address, date of birth, gender, nationality, contact details, identification and payment information.

**Purchasing Information** – this is collected at your point of purchase including what you purchase, how often your purchase, and any associated rewards and benefits linked to your purchasing.

**Device and Usage Information** – this is collected when using one of our websites or mobile application often through use of cookies. The information that we collect includes technical information related to your browser and device from the user agent, your internet protocol (IP) address, the website that referred you to our website, the web pages that you view, and the services or functionality you access or use. Some of this information is collected from your browser while other information is collected using cookies, web beacons and similar technologies.

Via our Security or IT systems - such as with door entry systems and reception logs, or automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

## **Information that we collect from other sources**

Some information that we collect is publicly available. For example, we may collect information you submit to a blog, a chat room, or a social network like Facebook, Instagram, Twitter or Google+. We may also collect information which you submit as a review of your experience. We use this information to improve and enhance your experience by being able to offer products and services which may better suit your requirements. Some information is collected from a third party with your consent, such as you bank or building society.

## **What we use your information for**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

- 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.

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 information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide products AND/OR services to you.	For the performance of our contract with you or to take steps at your request before entering into a contract.
To prevent and detect fraud against you and us.	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you.
Conducting checks to identify our customers and verify their identity.  Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation or rules issued by our regulator.	To comply with our legal and regulatory obligations.
Ensuring business policies are adhered to, e.g. policies covering security and internet use.	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Ensuring the confidentiality of commercially sensitive information.	For our legitimate interests or those of a third party, i.e. 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, e.g. in relation to our financial performance, customer base, product range or other efficiency measures.	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price.
Preventing unauthorised access and modifications to systems.	For our legitimate interests or those of a third party, i.e. 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.	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, e.g. making sure that we can keep in touch with our customers about existing orders and new products.
Statutory returns.	To comply with our legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	To comply with our legal and regulatory obligations

What we use your personal information for	Our reasons
	For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers.
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts.	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations.

The information we collect may relate to:

- Customers who are subscribed to a customer program.
- Applicants and potential or prospective subscribers.
- Guests and other customers.
- Suppliers of services to HG.
- Employees of HG.

The information that we collect may be used to:

- Support the provision of services and facilities of HG, using this information to improve the services and facilities on offer.
- To provide a more bespoke and customized user experience.
- Handle customer service requests, enquiries and purchasing requests.
- Improve your online experience with us through our websites and our mobile applications.
- Ensure prompt processing of applications and the administration and correspondence required to support these services.
- Provide appropriate safety and security on the premises and online.
- Administrate the operation of the venue such as paying our employees and our suppliers and people management.
- Provide appropriate promotional messaging which may be of interest to yourself where consent has been given.
- Ensure legal obligations are met regarding applicable regulations inclusive of the Track and Trace scheme.

### **Promotional communications**

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to

send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it with other organisations outside the HG group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

1. Contacting us.
2. Using the 'unsubscribe' link in emails or 'STOP' number in texts.
3. Updating your marketing preferences in our preference settings.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We would like to be able to contact you for market research occasionally.

### **How we share your information**

We may share your information in the following ways:

#### Service Providers

We will share your information with service providers that support our operations either in our venues, through our mobile application or through our websites. More specifically this could be support through payment processing, website hosting, application hosting, reservations, loyalty, point of sale and customer verification. When sharing this information, we only pass the absolute minimum amount of data to allow these service providers to deliver on their contract with us to support your experience.

#### Business Transactions

Should we become involved in a merger or another situation involving the transfer of some or all our assets, we may share your information with other entities involved in that situation.

#### Legal Obligations

We may disclose your information if we believe that the disclosure is required by law or a legal process or if it becomes necessary for us to share your information in order to uphold the contract between ourselves and yourselves.

#### With Consent

If you give us consent, permission or direction to share your information with other companies or services, we will then share your information with relevant parties. For example, information in respect of payments may be shared with our bank.

#### Through Websites

When posting on our websites, any information that you share including your username could be visible by other users of those services.

### **How long we hold your information for**

We will keep your personal information while you have an account with us or we are providing products and 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.

### **How we keep your information**

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal information with').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: 'Transferring your personal information out of the UK and EEA'.

### **Transferring your personal information out of the UK and EEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK and/or European Economic Area (EEA), e.g.:

1. With our offices or other companies within our group located outside the UK/EEA;
2. With your and our service providers located outside the UK/EEA;
3. If you are based outside the UK/EEA;
4. Where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law. This means we can only transfer your personal information to a country or international organisation outside the UK/EEA where:

1. The European Commission has issued an 'adequacy decision' in relation to that country or international organisation; or
2. There are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
3. A specific exception applies under data protection law

These are explained below.

#### **European Commission adequacy decision**

The European Commission has the power to determine whether a country or international organisation provides an adequate level of protection for personal information and, if it does, to issue an 'adequacy

decision'. The effect of such a decision is that personal information can flow from the UK/EEA to that country without any further safeguards being necessary.

It can take several years for the European Commission to issue an adequacy decision and only a small number of countries currently benefit from one.

Other countries or international organisations we are likely to transfer personal information to do not have the benefit of an adequacy decision. This does not necessarily mean they provide inadequate protection for personal information, but we must look at alternative grounds for transferring the personal information, such as implementing safeguards or relying on an exception, as explained below.

Transfers with appropriate safeguards

We may transfer your data to a third country or international organisation on this ground where we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using standard data protection contract clauses approved by the European Commission

### **Transfers under an exception**

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal information to a third country or international organisation where an exception applies under relevant data protection law, for example:

1. You have explicitly consented to the proposed transfer after having been informed of the possible risks;
2. The transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
3. The transfer is necessary for a contract in your interests, between us and another person; or
4. The transfer is necessary to establish, exercise or defend legal claims

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal information on this ground.

### **Further information**

If you would like further information about data transferred outside the UK or EEA, please contact us.

### **How we use cookies and similar technologies**

We and others use or may in the future use technologies which collect information about your device and your usage of our mobile application and websites. Most browsers can be programmed to accept or reject the use of some or all of these technologies, however, you may need to take additional steps to reject or control the use of some technologies.

**User Agents and Request Headers** – these request headers are characteristic strings that let servers and network peers identify the application, operating system, vendor, and/or version of the requesting user agent. These can be used to support error handling which includes the anticipation, detection and resolution of programming, application and communication errors and to support providing custom features suitable for specific browsers or devices.

**Cookies** – these are small data files which are sent from a website’s server to your hard drive. These contain information which can later be read by a web server. Session cookies can only be read for the duration of your visit to the website, persistent cookies can be read for a fixed amount of time.

**Web Beacons** – these are small, transparent images which are embedded within websites, emails or mobile applications. They can be used to check the performance of a marketing campaign or if an email has been read.

**Java Scripts** – these are code snippets embedded in various parts of websites and applications that support multiple functionalities, including accelerating the refresh speed of certain functionality or monitoring usage of various online components.

**Entity Tags** – these are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser. This validates these caches when the website is opened, accelerating website performance since a full response does not need to be sent to the server if the data hasn’t changed.

**HTML5 Local Storage** – this allows for data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited.

**Social Networks** – there are certain added features to our websites and mobile application that allow social networks to track the activities of their members or collect certain information when they use our website or mobile applications. If you are concerned about the way in which a social media company is handling your data, then please visit their privacy policy which can be found on their website.

Many of these settings can be changed within the help menu of your browser which will allow you to accept or reject certain collection of your data by us through our platforms. Should you wish to ensure that your location is not tracked, please visit your settings within your mobile device.

Our websites or mobile applications may contain links to other websites of interest. However, if you use these links to leave our website, please note that we do not have any control over any other websites. Thus, we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such other websites as these are not governed by this Privacy Notice. Please exercise caution before clicking any links and look at the Privacy Notice applicable to the website in question before providing any information.

### **Controlling your personal information**

We will not sell, distribute or lease your personal information to third parties other than as we have outlined above unless we have your permission or are required by law to do so. If you have given us your permission to do so, we may use your personal information to send you promotional information about other services or facilities, which we offer, or about third parties which we think you may find interesting.

### **Your rights in relation to your data**

You have the following rights:

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



Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. 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: —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, e.g. 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 our Data Protection Officer—see below: ‘**How to contact us**’; and
- let us have enough information to identify you;
- 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 we 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 policy**

This privacy notice was published on 26/10/2020 and last updated on 26/10/2020.

We may change this privacy notice from time to time—when we do, we will inform you via our website.

### **How to contact us**

Please contact our Data Protection Officer in the following ways:

- in writing to the Data Protection Officer, 37 Shepherd Street, London, W1J 7HZ.
- through email addressed to the Data Protection Officer at [contact@huntergold.com](mailto:contact@huntergold.com).