# **ULG Websites Privacy Statement Template**

The website www.theelgin.com is operated by Urban Leisure (MV) Ltd. on behalf of the Elgin.

Urban Leisure (MV) Ltd.
Company Number: 7934041
VAT Number:138400140
Registered Office:
Jeffreys Henry LLP
Finsgate
5-7 Cranwood Street
London
EC1V 9EE

You have the right to withdraw consent, to correct, or to erase your personal data at any time, where relevant. Where your information is required for statutory recordkeeping purposes, we reserve the right under UK Data Protection law not to comply with your request.

Any questions regarding this Policy or if you wish to request a copy of your personal information, a request should be sent via email to our Data Protection Officer:

# dataprotection@ulg.co.uk

ULG Ltd. identifies itself as a Data Controller under Data Protection law. You may lodge a complaint with the ICO in the event of ULG's non-compliance with applicable Data Protection law, or the relevant competent authority in your legal jurisdiction.

ULG adheres strictly to our legal duty to protect any personal information we collect from you.

ULG does not capture and store any personal information about the individuals who access this web site, except where you voluntarily choose to give us your personal details via email, by signing up to a newsletter or by using an electronic booking form. In these circumstances, the personal information that you give us will only be used to provide the information or service you have requested.

ULG uses various applications to administer your personal data. We do not use these tools to perform profiling or any kind of automated decision-making about you or your organisation.

ULG would like to hold your personal data in electronic database form, including the use of cloud-based applications. ULG make sure to select cloud providers who provide suitable guarantees over the privacy and rights associated with your personal data.

In order to administer the company and keep records, ULG uses 3<sup>rd</sup>-party providers that host data outside of the EU. All such providers commit to the US-EU Privacy Shield and are committed to keeping your data safe. Where appropriate, the providers align to the ISO 27001 standards of data governance.

In order to make sure we do not bother you with irrelevant emails, we retain your communications preferences on a database that has tools for bulk emailing. Your main contact details will be kept for an indefinite period, or until you inform us that you wish us to erase your data or unsubscribe from ULG communications altogether.

ULG will ask you for your consent to use email for marketing or promotional purposes and will provide the means to opt out at any time.

We cannot absolutely guarantee the security of any information that you transmit to us via the internet and remind you that you do so at your own risk. All personal details are held on encrypted devices, protected with password protection which where possible is dual-factor authenticated.

#### Statistical data

We automatically collect statistical data about usage patterns on our website. This information is not used to identify any individual. It is only collected to provide us with an understanding of the areas of interest on our site and kept only for as long as required for this purpose.

### **Cookies**

The use of cookies by ULG complies with the EU Privacy Directive, adopted by the UK in its updated Privacy and Electronic Communications Regulations that came into force on May 26th 2012. The so-called "Cookie Law" requires websites to obtain consent from visitors to store or retrieve any information on a computer or any other web connected device, like a smartphone or tablet.

A cookie is a text file that is used by many websites to identify your computer to their server. Cookies in themselves do not identify the individual user, just the computer used. This is done in order to make your experience of the JDA website smoother by remembering any preferences or settings from the previous visit. ULG also tracks the volume of traffic on its website by using cookies.

ULG will continue to check and monitor our data protection obligations to ensure they are up to date. ULG will develop and evolve their website, therefore this Policy will adapt to those changes. Please check this page occasionally to ensure that you are aware of any changes.

This Privacy notice was last updated in May 2018.

## **Customer Onboarding Data Privacy Notice**

- 1. ULG Ltd. identifies itself as a Data Controller under Data Protection law. You may lodge a complaint with the ICO in the event of ULG's non-compliance with applicable Data Protection law, or the relevant competent authority in your legal jurisdiction.
- 2. You have the right to contact us in order to remove consent, to correct, amend, or to erase your personal data at any time, where relevant. Where your information is required for statutory recordkeeping purposes, we reserve the right under UK Data Protection law not to comply with your request.
- 3. Any questions regarding this Policy and our privacy practices, and/or if you wish to review or request a copy of your personal information, email our Data Protection Officer:

# dataprotection@ULG.co.uk

- 4. ULG uses various applications to administer your personal data. We do not use these tools to perform profiling or any kind of automated decision-making about you or your organisation.
- 5. ULG would like to retain and process your information, which may involve the use of cloud-based applications. ULG make sure to select cloud providers who provide suitable guarantees over the privacy and rights associated with your personal data. Where appropriate, the providers align to the ISO 27001 standards of data governance.
- 6. Your personal data is stored and processed in data centres located in the UK.
- 7. We will keep your personal data for at least the minimum statutory period allowed, normally in the case of financial records this is 6 years. Please note that ULG has a legitimate interest in retaining your personal data for legal and financial record keeping purposes.
- 8. ULG will not give your data to any third parties unless required for the proper administration of your account and for the avoidance of doubt, will never give your personal details to third parties for marketing or other non-essential purposes.
- 9. We cannot absolutely guarantee the security of any information that you transmit to us via the internet and remind you that you do so at your own risk. All personal details- Personally Identifiable Information (PII)- are held on encrypted devices, protected with password protection which where possible is dual-factor authenticated.