

## **GREYFORT GROUP**

# **PRIVACY POLICY**

The Greyfort Group knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly.

This notice describes Greyfort Group's privacy policy; please read it in order to understand what we do with your information. By visiting the list of websites below or accessing and using our services, you are accepting and consenting to the practices described in this Privacy Notice and our Cookie Policy:

greyfortgroup.co.uk – Greyfort Services Limited is responsible for this website.

greyfort.co.uk – Greyfort Properties Limited is responsible for this website.

impneyestate.co.uk – Impney Limited is responsible for this website.

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how Greyfort Group collects and processes your personal data. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

#### **1. WHO WE ARE AND HOW YOU CAN CONTACT US**

Greyfort Group is made up of different legal entities, details of which are as follows:

Greyfort Holdings Limited registered in England and Wales number 00393884

Greyfort Properties Limited (trading as Greyfort Properties) registered in England and Wales number 00721940

Greyfort Finance Limited registered in England and Wales number 08360864

Greyfort Services Limited registered in England and Wales number 08370089

Greyfort (Impney Estate) Limited registered in England and Wales number 08360766

Impney Limited registered in England and Wales number 13065951

This privacy notice is issued on behalf of each of those entities so when we mention "Greyfort", "we", "us" or "our" in this privacy notice, we are referring to the relevant trading entity in Greyfort Group responsible for processing your data and that particular company is the controller of your data. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please email these to [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.





**The Greyfort Group Companies** In accordance with the UK Data Protection Act 1998, the following companies are registered with the United Kingdom's Information Commissioner's Office as a data controller to collect information:

Data controller: Greyfort Properties Limited  
Registered company number: 00721940  
ICO number: ZA247419

Data controller: Impney Limited  
Registered company number: 13065951  
ICO number: ZB127673

Registered Office for all the above:

Impney Hall, Impney Estate, Droitwich Spa, WR9 0BN.

#### **CONTACT DETAILS**

Data Privacy Manager  
Email address: [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk)  
Postal address: Impney Hall, Impney Estate, Droitwich Spa, WR9 0BN.  
Telephone number: 01905 796 111

## 2. THE DATA WE COLLECT ABOUT YOU

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this privacy policy. We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations, for example, our partners. The type of data we collect about you includes:

- A. **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender, your image and car registration numbers.
- B. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- C. **Financial Data** includes bank account and payment card details.
- D. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- E. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, as well as your journey through our digital platform (such as the links you click on and searches you make), which videos you have watched and for how long, what content you like and share, your subscription status, which pop up or push messages you might have seen and responded to and information collected in any forms you complete. We may also analyse which marketing activity led to you taking specific action on our digital platforms.
- F. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- G. **Usage Data** includes information about how you use our website, products and services.
- H. **Marketing and Communications Data** includes your preferences in receiving marketing from us, our third parties and your communication preferences.
- I. **Sensitive Personal Data** includes data about your health or dietary requirements (we do not collect any other type of sensitive personal data).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In certain situations, we may collect **Special Categories of Personal Data** about you, but this is limited to information about your health where this is required for certain activities and biometric data for some aspects of security. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### Individuals under 16

The Greyfort Group does not intentionally or knowingly process personal information from individuals under the age of 16, with the following exceptions:

- use of actors at our sites; and
- school visits or work experience candidates to our sites.

When necessary, underage users will be told not to submit any personal details and we will make every effort to delete any details of such users where a parent or guardian has informed us that these details or applicable data as defined by law have been collected. Where we collect data relating to children we have a separate privacy notice which can be requested from our Data Privacy Manager by emailing [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk).

### 3. HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you, including through:

**Direct interactions:** You may give us your data by filling in forms, using our website, using Wi-Fi, by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

apply for our products, tickets, experiences or services; attend one of our events; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; enter a competition or promotion; surveys; or give us some feedback.

**Automated technologies or interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

**CCTV:** We operate a number of CCTV cameras across our premises and at our events.

**Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources, such as:

- A. Technical Data from analytics providers such as Google; advertising networks and search information providers all based inside and outside the EU.
- B. Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU;
- C. Identity and Contact Data from data brokers or aggregators based inside or outside the EU and from publicly available sources such as Companies House and the Electoral Register based inside the EU;
- D. Identity, Contact and Financial Data from based in the EU;
- E. Identity, Contact, Marketing and Communications Data from research or marketing agencies.

### 4. HOW WE USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the reasons we rely on to do so. We have also identified what our legitimate

interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose	Type of data	Our reasons	Lawful basis for processing including basis of legitimate interest
To sell services and products	Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data	(a) Your consent (b) Fulfilling contracts (c) our legitimate interests (d) our legal duty	(a) Keeping our records up to date, working out which of our products and services may interest you and telling you about them. (b) Developing products and services, and what we charge for them. (c) Defining types of customers for new products or services. (d) Seeking your consent when we need it to contact you. (e) Being efficient about how we fulfil our legal duties.
To register you as a new customer	Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data	(a) Your consent (b) Fulfilling contracts (c) our legitimate interests (d) our legal duty	(a) Being efficient about how we run our clubs and offer our club products to members (b) Developing products and services, and what we charge for them.
To manage our relationship with you which will include: (a) managing all service and product provisions including: bookings for events, filming and photography, lettings, property management and other property	Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data	(a) Your consent. (b) Fulfilling contracts (c) Our legitimate interests	(a) Being efficient about how we fulfil our contractual obligations to you (b) To study how our customers use our products/services, to develop them and grow our business

<p>services; lending services</p> <p>(b) customer enquiries and customer journey improvements;</p> <p>(c) administering customer accounts, customer queries and complaints (d) obtaining and monitoring reviews, surveys or feedback</p> <p>(e) notifying you about changes to our terms</p> <p>(f) responding to complaints and seek to resolve them</p>			<p>(c) To keep our records updated and to define types of customers for our products and services</p> <p>(d) Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</p> <p>(e) to develop our business and to inform our marketing strategy)</p> <p>(f) Seeking your consent when we need it to contact you.</p>
<p>To process and deliver your orders including:</p> <p>(a) managing payments, fees and charges</p> <p>(b) collecting and recovering money owed to us</p> <p>(c) ensuring you receive the products and services you pay for</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Financial Data</p> <p>Transaction Data</p> <p>Usage Data</p>	<p>(a) Fulfilling contracts</p> <p>(b) our legitimate interests</p>	<p>(a) To recover debts due to us</p> <p>(b) To be efficient about how we process and deliver your orders</p>
<p>To develop and manage our brands, products and services, to test new products, to manage how we work with other companies that provide services to us and our customers</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Financial Data</p> <p>Transaction Data</p> <p>Usage Data</p> <p>Marketing and Communications Data</p>	<p>(a) Your consent</p> <p>(b) Fulfilling contracts</p> <p>(c) Necessary for our legitimate interests</p> <p>(d) Our legal duty</p>	<p>(a) For developing products and services and what we charge for them</p> <p>(b) Defining types of customers for new products or services</p> <p>(c) to be efficient about how we run our contracts with other companies that provide services</p>
<p>To enable you to complete a survey</p>	<p>Identity Data</p> <p>Contact Data</p> <p>Marketing and Communications Data</p>	<p>(a) Your consent</p>	
<p>To administer and protect our business, to detect, investigate, report and seek to</p>	<p>Identity Data</p> <p>Financial Data</p> <p>Transaction Data</p> <p>Technical Data</p>	<p>(a) Necessary for our legitimate interests</p> <p>(b) Our legal duty</p>	<p>(a) For running our business, provision of administration and IT</p> <p>Prevention of fraud</p>

<p>prevent crime (including sharing passport information), to manage risk for us and our customers, to obey laws and regulations that apply to us</p>	<p>Profile Data Usage Data</p>		<p>and related offences services, network security, to prevent fraud. (b) For reporting possible criminal acts or threats to public security. (c) Developing and improving how we deal with financial and other types of crime, as well as fulfilling our legal duties in this respect (d) Complying with regulations that apply to us. (e) Being efficient about how we fulfil our legal and contractual duties and obligations</p>
<p>To manage disputes, claims and complaints, to negotiate and administer contracts, to manage the administration of H&amp;S, accident reporting</p>	<p>Identity Data Contact Data Transaction Data Technical Data</p>	<p>(a) Fulfilling contracts (b) Necessary for our legitimate interests (c) Our legal duty</p>	<p>(a) Being efficient about how we fulfil our legal and contractual duties and obligations.</p>
<p>To operate an effective PR process, including media accreditation, relationship building and processing invitations and guest lists</p>	<p>Identity Data Contact Data Marketing and Communications Data</p>	<p>(a) Your consent (b) Fulfilling contracts (c) Necessary for our legitimate interests</p>	<p>(a) To manage effectively the flow of information between us and the public (b) to provide exposure to our audiences using topics of public interest and news items (c) To enable us to operate successful events and grow our business.</p>
<p>To run our business in an efficient and proper way. This includes managing our financial position; business</p>	<p>Financial Data Transaction Data Technical Data Profile Data Usage Data</p>	<p>(a) Necessary for our legitimate interests (b) Our legal duty</p>	<p>(a) To comply with regulations that apply to us (b) To be efficient about how we fulfil</p>



capability; planning; communications, corporate governance and audit			our legal and contractual duties
To enable us to fulfil landlord and lettings obligations and manage tenancies	Identity Data Contact Data Financial Data Transaction Data	(a) Fulfilling contracts (b) Necessary for our legitimate interests (c) Our legal duty	(a) To operate our residential and commercial portfolio, and our customers' portfolios effectively
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Data Contact Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data	(a) Your consent (b) Necessary for our legitimate interests	(a) To study how our customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences; to track your activity on our digital platforms	Identity Data Contact Data Transaction Data Technical Data Profile Data Usage Data	(a) Your consent (b) Necessary for our legitimate interests	(a) To define types of customers for our products and services, (b) to keep our website updated and relevant, (c) to develop our business and to inform our marketing strategy
To provide catering and hospitality services to you	Identity Data Sensitive Personal Data (health and dietary only)	(a) Your consent (b) Fulfilling contracts	
To make suggestions and recommendations to you about goods or services that may be of interest to you; for profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us	Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data	(a) Your consent (b) Necessary for our legitimate interests	(a) To develop our products/services and grow our business

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us, and you have opted in to receiving that marketing.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside the Greyfort Group for marketing purposes.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of products or services as we will still need to contact you regarding your purchase.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

Information about our customers, guests and invitees is an important part of our business and we do not sell it to others. We only share it in the circumstances set out below.

**Affiliated Businesses:** As part of a group of companies we share data to other data controllers in the Greyfort Group to be used for similar purposes. If your personal data is transferred or disclosed to another data controller within the Greyfort Group, that other data controller shall have the same rights and obligations with regard to your personal data.

**Non-Affiliated Businesses:** We have relationships with a small number of other companies who are our commercial partners with whom we may share data for the purposes of our events or services,

for prize draws and competitions or for marketing their goods or services. They have access to a limited amount of personal information needed to put their partnership rights into effect but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Notice and as permitted by applicable data protection laws. For a current list of Non-Affiliated Businesses please contact [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk). We cannot guarantee the list to be comprehensive as our arrangements change from time to time.

**Third Party Service Providers:** We employ other companies and individuals to perform functions on our behalf, fulfil our obligations and as activation partners. Examples of such activity include referencing, carrying out surveys, analysing data, providing marketing assistance, processing credit card payments, providing customer services, delivering ticketing and merchandise, retailers, social networks, fraud prevention agencies, payroll service providers, land agents, medical practitioners, digital agencies, hosting providers, data storage providers and other technical partners. They have access to personal information needed to perform their functions but may not use it for other purposes. Furthermore, they must process the personal information in accordance with this Privacy Notice and as permitted by applicable data protection laws. For a current list of Third Party Service Providers please contact [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk). We cannot guarantee the list to be comprehensive as our arrangements change from time to time.

**Promotional Offers:** Sometimes we send offers to selected groups of customers on behalf of other businesses. When we do this, it will only be in circumstances where you have indicated the necessary marketing preferences.

**Protection of Greyfort and third parties:** We release account and other personal information when we believe release is appropriate to: comply with the law; enforce or apply our Conditions of Use and other agreements; or protect the rights, property or safety of Greyfort, our customers or others. This includes exchanging information with Health and Safety and Food Safety consultants, our brokers and insurers, the emergency services, other organisations for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing or otherwise disclosing personally identifiable information from customers for commercial purposes in a way that is contrary to the commitments made in this Privacy Notice.

**With Your Consent:** other than as set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information.

## 6. INTERNATIONAL TRANSFERS

Some of our external third parties may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission, where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe, where we use providers based in the US and we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

## 7. DATA SECURITY

We may monitor or record telephone calls for security purposes and to improve the quality of services that we provide to you. Please note that for your safety and security, CCTV is in operation in all of our premises which are open to the public. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. You have the right to ask Greyfort to provide you with all the information it stores on you. If you wish to see all of the personal data held on you, you can make a Subject Data Access Request by contacting [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk). You have the right to ask Greyfort to rectify, block, complete and delete your personal data, to restrict its use, and to port your data to another organization. You also have the right to object to the processing of your data by Greyfort in some circumstances and, where we have asked for consent to process your data, to withdraw this consent. You may contact [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk) if you would like assistance with any of the aforementioned rights. There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if Greyfort is legally prevented from disclosing such information. In addition, Greyfort may be able to retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your data.

## 8. DATA RETENTION – HOW LONG WILL WE USE YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please read below to find out more about these rights:

- A. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- B. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- C. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with

local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- D. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- E. **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- F. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- G. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. If you wish to exercise any of the rights set out above, please contact the Data Privacy Manager at [dataprivacy@greyfort.co.uk](mailto:dataprivacy@greyfort.co.uk). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.