



PRIVACY POLICY

Effective Date: 27th September 2020

DEFINITIONS:

In this Agreement the following definitions apply:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 10, below;
“Our Site”	means this website: https://www.city-camping.co.uk/ ;
“IGO/We/Us/Our”	means City Camping, a subsidiary of Audur Vesteyns Ltd.
“You/Your”	refers to the data of the client of City Camping

This Privacy Policy applies to the City Camping Ltd. owned and operated websites and its subdomains. CC knows that you care how information about you is used and shared. This Privacy Policy explains what information of yours will be collected by CC when you access the Sites and CC's Service (including through the websites of our partners), how the information will be used, and how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources. The use of information collected through our sites shall be limited to the purposes under this Privacy Policy and our Terms of Service to customers.

Please note that this Policy is made in parallel to our legal documents. To the extent the terms of this Policy or the General Data Protection Regulation (EU) 2016/679 ("GDPR" and collectively with this Policy, the "EU Policies") conflict with any terms of the Legal Terms, the terms of the EU Policies shall control.

1 WHAT DOES THIS POLICY COVER?

- 1.1 This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

2 WHAT DATA DO WE COLLECT?

- 2.1 CC processes Personal Data as a Controller as defined by the GDPR 2018. Some data will be collected automatically by Our Site (for further details, please see section 10 on our use of Cookies, other data will only be collected if you voluntarily submit it, for example, when signing up for an account. Depending upon your use of Our Site, We may collect some or all of the following data:

- (a) Name;
- (b) Date of birth;
- (c) Gender;
- (d) Profession;
- (e) Contact information such as email addresses and telephone numbers;
- (f) Demographic information such as postcode, preferences and interests;
- (g) Financial information such as credit / debit card numbers;
- (h) IP address (automatically collected);
- (i) Web browser type and version (automatically collected);
- (j) Operating system (automatically collected); and
- (k) a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected).

3 HOW DO WE USE YOUR DATA?

- 3.1 All personal data is stored securely in accordance with the principles of the GDPR 2018. For more details on security see section 6, below.

- 3.2 We use your data to provide the best possible products and services to you. This includes:

- (a) Providing and managing your Account;
- (b) Providing and managing your access to Our Site;
- (c) Personalising and tailoring your experience on Our Site;
- (d) Supplying Our products and services to you;
- (e) Personalising and tailoring Our products and services for you;
- (f) Responding to communications from you;
- (g) Supplying you with email alerts and newsletters that you have subscribed to (you may unsubscribe or opt-out at any time using the unsubscribe link at the bottom of these emails);
- (h) Advertising and remarketing product and services to you via services provided by Google Adwords and Facebook Ads.
- (i) Market research; and
- (j) Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience via Google Analytics.

- 3.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email or telephone, or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR 2018.

- 3.4 Advertisers whose content appears on Our Site may engage in what is known as “behavioural advertising” – advertising which is tailored to your preferences, based on your activity. Your activity is monitored using Cookies, as detailed below in section 10. You can control and limit your data used in this way by adjusting your web browser’s privacy settings. Please note that We do not control the activities of such advertisers, nor the information they collect and use. Limiting the use of your data in this way will not remove the advertising, but it will make it less relevant to your interests and activities on Our Site.

4 HOW AND WHERE DO WE STORE YOUR DATA?

- 4.1 We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it.
- 4.2 Some or all of your data may be stored or transferred outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998. Such steps may include, but not be limited to, the use of legally binding contractual terms between Us and any third parties We engage and the use of the EU-approved Model Contractual Arrangements.
- 4.3 Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- 4.4 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

5 DO WE SHARE YOUR DATA?

- 5.1 We will not sell or rent your data to third parties except as described in this Privacy Policy. We may disclose your data to other companies or people under any of the following circumstances:
- 5.1.1 To any applicable event, organiser, or other service provider for each event or activity that you sign up for on the Site to fulfill your booking.
- 5.1.2 To events which you attend through the platform for marketing purposes. A core part of City Camping service is enabling new experiences for its members through its event partners, as such our event partners are critical to our ability to serve our users. Our relationship relies on us being able to share our members’ information with our partners so that our business partners can develop and serve their own communities beyond our users attending their studios through the City Camping platform; this allows City Camping to offer its users the chance to experience new opportunities. Our users’ information will only be shared with those events that they choose to book. We respect your decision to manage your communications and you can change your preferences at any time through your account settings or by contacting us by email at info@georgebullard.co.uk.
- 5.1.3 If sharing the information is reasonably necessary to provide a service that you have requested.

- 5.1.4 To keep you up to date on the latest product announcements, software updates, special offers, or other information we think you would like to hear about from us where you have given consent for the appropriate type of communication.
- 5.1.5 To keep you up to date on special offers, or other information from our business partners where you have given consent for the appropriate type of communication.
- 5.2 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 5.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 5.4 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

6 WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

- 6.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 6.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will not, however, be given the choice to have your data deleted or withheld from the new owner or controller.

7 HOW CAN YOU CONTROL YOUR DATA?

- 7.1 When you submit information via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails).
- 7.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

8 YOUR RIGHT TO WITHHOLD INFORMATION

- 8.1 You may access certain areas of Our Site without providing any data at all. However, to use all the features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 8.2 You may restrict your internet browser's use of Cookies. For more information, see section 10.

9 HOW CAN YOU ACCESS YOUR DATA?

- 9.1 You have the legal right to access, delete and amend any of your personal data held by Us (where such data is held). Please contact Us for more details at info@georgebullard.co.uk, or using the contact details below in section 11.

10 LINKS TO OTHER WEBSITES

- 10.1 Our website may link to other, unaffiliated third party websites. Please note that we are not, and cannot, control or be responsible for the content or privacy and confidentiality practices of any third party websites. You must always carefully review the privacy and confidentiality policy of any third party websites that you may visit in order to understand how the operators of that website may collect, store and use your Personal Information.

11 COOKIES

- 11.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. In addition, Our Site uses analytics services provided by Google Analytics which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site.

12 CONTACTING US

- 12.1 If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@georgebullard.co.uk, Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13 CHANGES TO OUR PRIVACY POLICY

- 13.1 We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.