

JENAHURA LIMITED – PRIVACY NOTICE

1. IMPORTANT NOTICE

This is the Privacy Notice of Jenahura Limited (company number 05418540) whose registered office is at Wey Court West, Union Road, Farnham, Surrey, United Kingdom (**Jenahura, we, us or our**) and sets out how we collect and process your personal data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This Privacy Notice relates to personal information that identifies **you** meaning our customers or potential customers, suppliers, individuals who browse our website or individuals outside our organisation with whom we interact.

We refer to this information throughout this Privacy Notice as **personal data** and paragraph 3 sets out further detail of what this includes.

Please read this Privacy Notice to understand how we may use your personal data.

This Privacy Notice is not intended for children and we do not knowingly collect personal data relating to children.

This Privacy Notice may vary from time to time so please check it regularly. This version of this Privacy Notice was first published on 12 June 2018 and has not been updated since.

2. HOW TO CONTACT US

For the purposes of relevant data protection legislation, we are a controller of your personal data and as a controller we use the personal data we hold about you in accordance with this Privacy Notice.

If you need to contact us in connection with our use or processing of your personal data, gain access to it, wish to correct your personal data held by us, opt out at any time from receiving marketing correspondence from us or to alter your marketing preferences please contact info@jenahura.com.

3. CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data about you that we may collect, use, store, share and transfer are:

- **Individual Data.** This includes personal data which relates to your identity, such as your first name, middle name, last name, username or similar identifier, marital status, title, date of birth and gender and your contact details such as your billing address, delivery address, email address and telephone numbers;
- **Advertising Data.** This includes personal data which relates to your advertising preferences, such as information about your preferences in receiving marketing materials from us and your communication preferences as well as your personal interests;

- **Information Technology Data.** This includes personal data which relates to your use of our website, such as your internet protocol (IP) address, login data, traffic data, weblogs and other communication 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 our website;
- **Sales Data.** This includes personal data which relates to the transactions you have conducted with us, such as details about payments to and from you, details of subscriptions to our services or publications and other details of products and services you have purchased from us;
- **Audio and Visual Data.** This includes personal data which is gathered using recording systems in the form of images, video footage and sound recordings that is taken at any of our events or otherwise by us for promotional purposes; and
- **Health Data.** This includes personal data which is gathered for health and safety purposes including any accident report or claim log or any information you provide about allergies or other medical conditions during the booking process or at one of our events.

We may also create Personal Data about you, for example, if you contact us by telephone to make a complaint, for example about our services or goods, then we may make a written record of key details of the conversation so that we can take steps to address the complaint.

We also obtain and use certain aggregated data such as statistical or demographic data for any purpose (“**Aggregated Data**”). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your Information Technology Data to calculate the percentage of users accessing a specific feature on our website. However, if we re-combine or re-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 addition, we may obtain certain special categories of your data (“**Special Categories of Data**”), and this Privacy Notice specifically sets out how we may process these types of personal data. The Special Categories of Data are: (i) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and (ii) the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

4. THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- Directly from you, either in person (both when you register for an event and during the course of our events), via our website or by telephone. This could include personal data which you provide when you:
 - (a) book a place at one of our events or otherwise place an order for our products or services;
 - (b) subscribe to our publications (including our newsletter);

- (c) request information on our products or services or for other marketing to be sent to you;
- (d) enter into a competition or promotion; and
- (e) complete a survey from us or give us feedback.
- Third parties, such as providers of social media platforms (such as FaceBook, Twitter and Instagram) for example where you share our content through social media, for example by liking us on Facebook, following or tweeting about us on Twitter.

5. HOW WE USE YOUR PERSONAL DATA & OUR BASIS FOR USING IT

We may rely on one or more of the following legal bases when processing your personal data. We have set out below the purposes for which we may process your personal data:

Purposes for which we process your personal data	Categories of personal data	The basis on which we can do this (this is what the law allows)
To register you as a new customer and process your booking of an event.	<ul style="list-style-type: none"> • Individual Data. 	<p>The processing is necessary</p> <ul style="list-style-type: none"> • to Perform a contract with you; and • for our legitimate interest in the provision of goods and services to our guests.
<p>In order to perform our contractual obligations to you. This would include:</p> <ul style="list-style-type: none"> • processing and performing any event bookings and orders placed by you; • orders placed by us where you are a supplier; • making or receiving payments, fees and charges; and • collecting and recovering money owed. 	<ul style="list-style-type: none"> • Individual Data; and • Sales Data. 	<p>The processing is necessary</p> <ul style="list-style-type: none"> • to perform any contract entered into with you; and • for our legitimate interest in recovering debts owed to us.
In order to comply with our own legal obligations, e.g. health and safety legislation, or to assist in an investigation (e.g. from the police).	<ul style="list-style-type: none"> • Individual Data; and • Audio and Visual Data. 	The processing is necessary for us to comply with the law .

<p>In order to use your personal data in life or death situations and there is no time to gain your consent (e.g. in the event of an accident and we have to give your personal details to medical personnel).</p>	<ul style="list-style-type: none"> • Individual Data. 	<p>The processing is necessary in order to protect the vital interests of an individual.</p>
<p>In order to manage our relationship with you including:</p> <ul style="list-style-type: none"> • to send you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice); • to provide you with important real-time information about products or services you have ordered from us (e.g. a change of time or location due to unforeseen circumstances); • to send you information you have requested; • to deal with your enquiries; and • to ask you to leave a review or feedback on us. 	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • I n f o r m a t i o n Technology Data; • Sales Data; and • Audio and Visual Data. 	<p>The processing is necessary</p> <ul style="list-style-type: none"> • to Perform a contract with you; and • for our legitimate interest in the provision of goods and services to our guests.
<p>In order to administer and protect our business, deal with any misuse of our website and to comply with our security policies.</p>	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • I n f o r m a t i o n Technology Data; • Sales Data; and • Audio and Visual Data. 	<p>The processing is necessary:</p> <ul style="list-style-type: none"> • for our legitimate interest in provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise; and • necessary to comply with the law.
<p>In order to make suggestions and recommendations to you about goods or services that may be of interest to you, deliver relevant website content and advertisements to you and to measure or understand the effectiveness of our advertising.</p>	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • I n f o r m a t i o n Technology Data; • Sales Data; and • Audio and Visual Data. 	<p>The processing is necessary for our legitimate interests to study how guests use our products/services, to develop our products and services and ensure our marketing is relevant to you, to grow our business and to inform our marketing strategy.</p>

For internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and to improve our website, products/ services, marketing, customer relationships and experiences.	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • Information Technology Data; • Sales Data; and • Audio and Visual Data. 	The processing is necessary for our legitimate interests in defining types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
To communicate with you about, and administer your participation in special events.	<ul style="list-style-type: none"> • Individual Data. 	The processing is necessary: <ul style="list-style-type: none"> • to Perform a contract with you; and • necessary for our legitimate interests to promote our business.
To sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers.	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • Information Technology Data; • Sales Data; and • Audio and Visual Data. 	The processing is necessary for our legitimate interests in the sale or disposal of our business or assets.
In order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties.	<ul style="list-style-type: none"> • Individual Data; • Advertising Data; • Information Technology Data; • Sales Data; and • Audio and Visual Data. 	The processing is necessary for our legitimate interests in protecting our business and property and recovering debts owed to us.

In addition, we may lawfully process Special Categories of Data in certain ways. We set these out below along with the legal bases on which we process these Special Categories of Data:

Purposes for which we process your personal data	Categories of personal data	The bases on which we can do this (this is what the law allows)
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<p>In order to use our knowledge of any health-related personal data you disclose to us in the event of illness or injury or some other related emergency or to record any accident or injury or other incident you may suffer when attending one of our events.</p>	<ul style="list-style-type: none"> • Health Data 	<ul style="list-style-type: none"> • The processing is necessary in connection with any contract that you may enter into with us. • The processing is necessary for us to comply with the law. • The processing is necessary in order to protect the vital interests of an individual. • We have a legitimate interest in carrying out the processing, which is not overridden by your interests, fundamental rights or freedoms. Our legitimate interest is in the promotion, management and operation of our business and the provision of goods and services to our customers. 	<ul style="list-style-type: none"> • The processing is necessary in order to protect the vital interests of you or another individual where you or the individual is physically or legally incapable of giving consent.
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6. WHO RECEIVES YOUR PERSONAL DATA

We may disclose your personal data to:

- our group companies and affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;
- third party suppliers for our events, including (without limit) golf courses, hotels and other event suppliers;
- HMRC, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;

- external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation); and
- third parties operating plugins or content (such as Facebook, Twitter, Instagram) on our website which you choose to interact with.

7. PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

You must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

8. ACCURACY OF YOUR PERSONAL INFORMATION

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

9. INTERNATIONAL TRANSFERS OF PERSONAL DATA

It is possible that personal data we collect from you may be transferred, stored and/or processed outside the European Economic Area, specifically to the destinations of any international events we run.

In connection with such transfers the relevant safeguard in place is the standard data protection contractual clauses between us and the recipient and a copy can be obtained by contacting us using the contact details set out in paragraph 2.

10. HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

We will store your personal data for the time period which is appropriate to the personal data we hold on you. We keep the length of time that we hold your personal data for under review. These reviews take place annually.

11. CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA

It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you. An example of this would be where we are unable to provide you with certain products or services as we do not have your full details, or where we cannot perform our contract with you at all because we rely on the personal data you provide in order to do so.

12. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Subject to applicable law including relevant data protection laws, you may have a number of rights in connection with the processing of your personal data, including:

- the right to request access to your personal data that we process or control;
- the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- the right to request, on legitimate grounds as specified in law:
 - (a) erasure of your personal data that we process or control; or
 - (b) restriction of processing of your personal data that we process or control;
- the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- the right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office or other relevant supervisory body. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 2.

13. LINKS TO OTHER WEBSITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control

unconnected third-party websites and are not responsible for any use of your personal data that is made by unconnected third party websites.