



PRIVACY & COOKIES POLICY

1. WHO ARE WE

This website (“Site”) is operated by **RKB Limited**, a company registered in England and Wales under registration number 10653422 (“Astons,” “we,” “us” and/or “our”). Our registered address is 30-32 High Street, Bedford, MK40 1SP. You can contact us as indicated under the “Contact” section below. The data controller responsible for your personal data is Astons company with whom you contract as a customer, member or membership applicant (“Astons,” “we,” “us” and/or “our”).

2. WHAT IS THIS PRIVACY POLICY IS FOR

This privacy policy (“**Privacy Policy**”) applies to personal data that we collect from you as a user of this Site or as a membership applicant, member or customer (“**you**” or “**your**” being interpreted accordingly). It provides information on what personal data we collect, why we collect the personal data, how it is used and the lawful basis on which your personal data is processed, and what your rights are under the applicable data protection and privacy laws, including the General Data Protection Regulation (“**GDPR**”) which will become applicable to us and you as of 25 May 2018.

‘Personal data’ as used in this Privacy Policy means any information that relates to you from which you can be identified. By using our Site or submitting your personal data you are taken to accept the terms of this Privacy Policy, so please read it carefully.

3. PERSONAL DATA WE COLLECT

3.1. Membership.

As a members club we require certain personal information about you if you apply to become a member.

- Name
- Date of birth
- Gender
- E-mail address
- Physical address
- Phone number
- Your favourite drink
- Your credit / debit card information

3.2. Events

Our events booking system will not be active at the time the website goes live. Our privacy policy will be updated accordingly when this element goes live.

3.3. Table & Party Booking

For a table booking we will require the following information about you.

- Name
- E-mail address
- Phone number

For a party booking we will require the following information about you.

- Name
- Event occasion
- Date of birth
- E-mail address
- Phone number

3.4. Contact Form

Should you use our contact form we will require the following information about you.

- Name
- E-mail address
- Phone number

4. HOW THE DATA IS COLLECTED.

4.3. Membership

Astons' website uses a combination of Woocommerce and Stripe plugins to process your membership application and payment.

4.3.1. Woocommerce

When you purchase from Astons, we'll ask you to provide information (listed in section 3.1. above) and optional account information like username and password. We'll use this information for purposes, such as, to:

- Send you information about your account and order
- Respond to your requests, including refunds and complaints
- Process payments and prevent fraud
- Set up your account for our store
- Comply with any legal obligations we have, such as calculating taxes
- Improve our offerings
- Send you marketing messages, if you choose to receive them. You are asked to opt in to receiving these messages when registering to become a member.

If you create an account, we will store your name, address, email and phone number, which will be used to populate the checkout for future orders.

As our membership is a recurring annual subscription we store the information about you until 6 months after your membership is ended either by Astons or yourself. This is to allow us to reprocess your payment annually and the 6 months is a “cooling off” period in case of a change of mind regarding end of membership.

4.3.1.1. Woocommerce Cookies

Cookies are used by WooCommerce in a variety of ways.

Cookies depend on specific features that are enabled on a store. The cookies are active when a user interacts with one of these features or to allow admin functions to be performed from within the store’s dashboard (/wp-admin).

Details are provided in tables below, listing various cookies that are set for users of stores with the WooCommerce plugin installed.

Store front end:

COOKIE NAME	DURATION	PURPOSE
woocommerce_cart_hash	session	Helps WooCommerce determine when cart contents/data changes.
woocommerce_items_in_cart	session	Helps WooCommerce determine when cart contents/data changes.
wp_woocommerce_session_	2 days	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer.
woocommerce_recently_viewed	session	Powers the Recent Viewed Products widget.
store_notice[notice id]	session	Allows customers to dismiss the Store Notice.
woocommerce_items_in_cart	session	Helps WooCommerce determine when cart contents/data changes.

No personal information is stored within these cookies.

Store dashboard (/wp-admin):

COOKIE NAME	DURATION	PURPOSE
woocommerce_snooze_suggestions__[suggestion]	2 days	Allows dashboard users to dismiss Marketplace suggestions, if enabled.
woocommerce_dismissed_suggestions__[context]	1 month	Count of suggestion dismissals, if enabled.
tk_ai	session	Stores a randomly-generated anonymous ID. This is only used within the dashboard (/wp-admin) area and is used for usage tracking, if enabled.

4.3.2. Stripe

Astons uses Stripe as the payment gateway to collect membership payments from our members. By using this extension, you may be storing personal data or sharing data with this external service. Stripe's privacy policy can be found here: <https://stripe.com/gb/privacy>

4.3.2.1. Stripe Cookies

This plugin/extension sets the following cookies:

- wp_woocommerce_session_HASH
- _stripe_mid – Learn more <https://stripe.com/gb/privacy>
- _stripe_sid – Learn more <https://stripe.com/gb/privacy>

4.4. COOKIES - GENERAL

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

5. HOW WE USE YOUR PERSONAL DATA

We use your personal data in the following ways:

- To acknowledge, confirm and deal with your membership application (and where necessary put you on our waiting list). Such use of your data is necessary in order to implement your request to become a member.
- Where you are a member, provide you with membership services, monitor your membership account and contact you regarding your use of the services. Such use is necessary to respond to or implement your request and for the performance of the contract between you and us.
- To complete and fulfill your reservation, for example, to process your payment, ensure that your table is available, and provide you with related customer service, including sending confirmations/ pre-arrival messages, assist you with events or celebrations.
- To contact you in connection with user/customer/member surveys and use any information you choose to submit in response, provided that you gave us your consent to being contacted in this way at the time you provided us with the personal data.
- Astons may provide you, or permit selected third-party service providers to provide you, with information about services, events, drinks promotions that we feel may interest you as a member or membership applicant. We (or such third party providers) will contact you by email only with your consent, which was given at the time you provided us with the personal data.
- As necessary for certain legitimate business interests, which include the following:
 - Where we are asked to deal with any enquiries or complaints you make.
 - To administer our Site, to better understand how visitors interact with our websites and ensure that our Site is presented in the most effective manner for you and for your computer/device.
 - To conduct analytics to inform our marketing strategy and enable us to enhance and personalise the experience we offer to our members and our communications, including by creating customer or member profiles to enable personalised direct marketing communications.
 - To provide postal communications which we think will be of interest to you.
- If you ask us to delete your data or to be removed from our marketing lists and we are required to fulfil your request, to keep basic data to identify you and prevent further unwanted processing.
- To share personal data among our affiliated businesses for administrative purposes, for providing membership services and in relation to our sales and marketing activities.

- We may anonymise, aggregate and de-identify the data that we collect and use such anonymised, aggregated and de-identified data for our own internal business purposes, including sharing it with our current and prospective members, business partners, our affiliated businesses, agents and other third parties for commercial, statistical and market research purposes, for example to allow those parties to analyse patterns among groups of people, and conducting research on demographics, interests and behavior.
- For internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site, network and information systems secure.
- To (a) comply with legal obligations, (b) respond to requests from competent authorities; (c) enforce our Astons Club Rules; (d) protect our operations or those of any of our affiliated businesses; (e) protect our rights, safety or property, and/or that of our affiliated businesses, you or others; and (f) enforcing or defending legal rights, or preventing damage.
- We may use your personal data for other purposes which you have consented to at the time of providing your data.

As used in this Privacy Policy, “legitimate interests” means the interests of Astons and our affiliated businesses in conducting and managing our organisation. When we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or those activities are otherwise required or permitted to by law. You have the right to object at any time to processing of your personal data that is based on our legitimate interests, on grounds relating to your particular situation.

6. DISCLOSURE OF YOUR INFORMATION

We may share your personal data with third parties in the following situations:

- **Service Providers:** Astons, sometimes hires selected third parties who act on our behalf to support our operations, such as (i) card processing or payment services (see the section below headed “Payment Information”), (ii) credit reference agencies to protect against possible fraud, (iii) IT suppliers and contractors (e.g. data hosting providers or delivery partners) as necessary to provide IT support and enable us to provide membership services and other goods/services available on this Site or to members, (iv) web analytics providers, (v) providers of digital advertising services and (vi) providers of CRM, marketing, membership system and sales software solutions. Pursuant to our instructions, these parties may access, process or store your personal data in the course of performing their duties to us and solely in order to perform the services we have hired them to provide.

- **Astons Affiliated Businesses:** In order to provide the services you request from us, our affiliated businesses may access and process the information which we collect from you for the purposes described above, including to offer products and services to you. Our affiliated businesses will only use your data for the purposes for which we originally collected it.

- **Business Transfers:** if we sell our business or our company assets are acquired by a third party personal data held by us about our members, membership applicants or customers may be one of the transferred assets.

- **Administrative and Legal Reasons:** if we need to disclose your personal data (i) to comply with a legal obligation and/or judicial or regulatory proceedings, a court order or other legal process. (ii) to enforce our Terms & Conditions, Astons Club Rules or other applicable contract terms that you are subject to or (iii) to protect us, our members, membership applicants, or contractors against loss or damage. This may include (without limit) exchanging information with the police, courts or law enforcement organisations.

7. PAYMENT INFORMATION

Any credit/debit card payments and other payments you make through our Site will be processed by our third-party payment providers and the payment data you submit will be securely stored and encrypted by our payment service providers using up to date industry standards. Please note that we do not ourselves directly process or store the debit/credit card data that you submit.

We may arrange that card or payment data you submit in support of a membership application is stored for the purpose of processing your application, initiating your membership and collecting your membership fee if your application is successful (or if you are put on to a membership waiting list, please note that this data may be stored for later use to initiate your membership).

We store and use this card or payment information for the purpose of processing any future payments that you make as a member for additional goods and services. We will store this data in accordance with our legal obligations under applicable law and only for so long as legally permitted.

You may choose to opt out of us holding your card or payment data although this means that you will need to re-supply us with card/payment details to initiate your membership subscription fee or for the purpose of making any future purchases.

8. PERSONAL DATA RETENTION

We will keep your personal data only for as long as is reasonably necessary for the purposes outlined in this Privacy Policy, or for the duration required by any legal, regulatory, accounting or reporting requirements, whichever is the longer. In particular, we retain membership records for one year after expiration or termination of your membership. We retain information submitted through the Site and the other websites we operate for one year following account closure or contact with you, as applicable. When you consent to receive marketing communications, we will keep your data until you unsubscribe.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data, applicable legal requirements or operational retention needs, and whether we can achieve those purposes through other means.

Upon expiry of the applicable retention period we will securely clear your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

9. SECURITY

Where we have given you (or where you have chosen) a password or log-in which enables you to access certain restricted parts of our Site, you are responsible for doing everything you reasonably can to keep these details secret. You must not share your password or log-in details with anyone else.

Unfortunately, the transmission of information over the internet or public communications networks can never be completely secure. We will take appropriate technical and organisational security measures to protect the personal data that you submit to us against unauthorised/unlawful access or loss, destruction or damage, although we cannot 100% guarantee the security of personal data that you provide to us online.

10. YOUR DATA PROTECTION RIGHTS

We will keep your personal data only for as long as is reasonably necessary for the purposes outlined in this Privacy Policy, or for the duration required by any legal, regulatory, accounting or reporting requirements, whichever is the longer. In particular, we retain membership records for six years after expiration or termination of your membership. We retain information submitted through the Site and the other websites

we operate for two years following account closure or contact with you, as applicable. When you consent to receive marketing communications, we will keep your data until you unsubscribe.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data, applicable legal requirements or operational retention needs, and whether we can achieve those purposes through other means.

Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

11. YOUR PERSONAL DATA PROTECTION RIGHTS

Certain applicable data protection laws give you specific rights in relation to your personal data. In particular, if the processing of your personal data is subject to the GDPR, you have the following rights in relation to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details such as the purpose of the data processing. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your personal data, such as where our legal basis for the processing is your consent and you withdraw consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data with so you can contact them directly. We may continue processing personal data where this is necessary for a legitimate interest in doing so, as described in this Privacy Policy.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, such as where you contest the accuracy of the personal data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to data portability:** You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will provide you with your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- **Right to object:** You may ask us at any time to stop processing your personal data, and we will do so:
 - o If we are relying on a legitimate interest to process your personal data -- unless we demonstrate compelling legitimate grounds for the processing or
 - o If we are processing your personal data for direct marketing.

- **Right to withdraw consent:** If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent.

- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your personal data, you can report it to the UK data protection authority (the Information Commissioner's Office or ICO), or, as the case may be, any other competent data protection authority of an EU member state that is authorised to hear those concerns.

If you wish to exercise any of these rights please contact us as described in the “**Contact**” section below. We may also need to ask you for further information to verify your identity before we can respond to any request.

12. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or modifications. If required by the applicable law, we will notify you of any material or substantive changes to this Privacy Policy.

13. CONTACT

Questions, comments or requests regarding this Privacy Policy should be addressed to:
info@astons-bedford.co.uk

