

Introduction

Foxtrot Hotel respects your privacy and is committed to protecting your personal data. This privacy notice tells you how we look after information you may provide to us about yourself in your dealings with us, both online and offline.

1. Purpose of this notice

This privacy notice explains our approach to any information about yourself that you might supply to us (or that might be collected from you) in your interactions with us which contains personal data and sets out your rights in respect of our processing of your personal data.

This privacy notice is intended to help you make informed decisions when using our website, resources and in your other interactions with Foxtrot Hotel. Please take a moment to read and understand it. Use of our website is also subject to our Cookies Policy, which should be read in conjunction with this privacy notice.

Please also note that this privacy notice only applies to the use of personal data collected by Foxtrot Hotel during your communications with us. It also applies to any communications with our selected service providers that we rely on to carry out some of our activity, but it does not apply to personal data collected during your communications with third parties.

2. Who are we and what do we do?

Foxtrot Hotel is the trading name of Foxtrot Tango Ltd. Foxtrot Hotel is a design and communication agency, founded in 2007 and based in London. References to (“we” “us” or “our”) in this privacy notice are references to Foxtrot Hotel.

Registered No: 06960663

The registered office address is:

The Barn
13-17 Margett Street
Cottenham
Cambridge
CB24 8QY

3. How to contact us?

If you have any questions about this privacy notice you can contact us on info@foxtrothotel.co.uk

4. When do we collect personal data?

We collect personal data about you in various different circumstances, most of which involve direct interaction between you and us, but some of which do not.

We collect personal data about you:

- When you engage with us on social media.
- When you contact us by any means with general queries.
- When you ask us to send you information.
- When you choose to complete any surveys, we send you.
- When you agree to provide any service to us.
- When you comment on or review our information.
- Any individual may access personal data related to them, including opinions. So, if your comment or review includes information about a member of our team that you dealt with, it may be passed on to them if requested.
- When you fill in any forms. For example, a contact form.
- When you've given a third-party permission to share with us the information they hold about you.
- From publicly-available sources (such as Companies House, the Electoral Register or the Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.

5. What sort of personal data do we collect?

Personal information may be collected from you in the following ways:

Information you voluntarily provide to us

We collect and maintain personal data that you voluntarily submit to us during your use of our website and your other interactions with us.

In particular, via our website, by email or by phone we may request the following personal information from you:

- name;
- company name (if applicable);
- title;
- address (home/office);
- email address;
- phone number.

Information we collect through your use of our website

Through our use of cookies, log files and other technologies, we may collect personal data regarding your mobile device or the computer hardware and software used to access our website. This may include the following:

- IP address of device(s) used;
- browser type;
- operating system and device type;
- approximate location
- access times and dates; and
- referring website addresses.

We also collect personal data regarding your use of and activity on our website.

This personal data allows us to deliver more helpful information, services and tools.

Information we collect from third parties

We may also combine personal data that we collect through your interactions with us with personal data that: a) you have provided to third parties and in respect of which you have given the third-party permission to share with us; and/or b) we have obtained from a public record.

6. What legal grounds do we have for using your personal data?

We will only use your personal data where the law allows us to. Under data protection law, there are various grounds (also referred to as lawful basis or legal basis) on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised the applicable grounds under GDPR to us as Contract, Legal Obligation, Legitimate Interests and Consent and outline what those terms mean in the following table:

| Term | Ground for processing | Explanation |
|----------------------|--|--|
| Contract | Processing is necessary for performance of a contract with you or to take steps at your request to enter a contract. | This covers carrying out our contractual duties and exercising our contractual rights. |
| Legal Obligation | Processing is necessary to comply with our legal obligations. | Ensuring we perform our legal and regulatory obligations. For example, health and safety obligations and avoiding unlawful discrimination. |
| Legitimate Interests | Processing is necessary for ours or a third party's legitimate interests. | We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms. |
| Consent | You have given specific consent to processing your data. | Generally, we rely on consent as a legal basis for processing your personal data only to send you information about Foxtrot Hotel via email or text message which you have not specifically asked us for. You have the right to withdraw consent to us sending you this information at any time by contacting us (see How to contact us? (Point .3)). |

7. How and why do we use your personal data?

We have set out below a description of the ways we use your personal data, and which of the lawful grounds for processing we rely on to do so.

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 (see How to contact us? (Point .3) 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 / Activity | Ground for Processing |
|--|---|
| By providing us with a testimonial, reference and/or providing us with other information about your activities which support the services provided by us | Consent, and or Legitimate interests, and or Contract |
| To respond to your communications with us e.g. a general enquiry | Legitimate interests |
| To manage our relationship with | Legal obligation Legitimate interests |
| To enable you to take part in the services we offer and provide | Legitimate interests Contract |
| To administer and protect our organisation | Legitimate interests Legal obligation |
| To deliver relevant content and other information and measure or understand the effectiveness of the information we send to you | Legitimate interests Consent |
| To use data analytics to improve our website, information, resources and user relationships and experiences | Legitimate interests |
| To make suggestions and recommendations to you about information that would be of interest to you with direct relationship to Fox Trot Hotel | Legitimate interests |

8. Communications from us

Communications from us will only be provided under consent, legitimate interest or contractual requirements. We will never provide your details to a third-party in any way, unless you specifically ask us to.

Third-party marketing

We will never share your personal data with any company for marketing purposes.

Opting out

You can ask us to stop sending you communications about Foxtrot Hotel at any time.

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 you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal ground which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. Use of cookies

Our website may use certain cookies, pixels, beacons, log files and other technologies of which you should be aware. 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 our website may become inaccessible or not function properly. Please see our cookies policy to find out more about the cookies we use and how to manage and delete cookies.

10. Third party links and services

Our website may contain links to third party websites and services. Please remember that when you use a link to go from our website to another website or you request a service from a third party, this privacy notice no longer applies.

Your browsing and interaction on any other website, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This privacy notice applies solely to personal data collected by us through our website and does not apply to these third-party websites and third-party service providers.

11. International transfers

The personal data that we collect from you may be transferred to third parties located in countries outside of the European Economic Area (“EEA”) including the United States.

If you would like more information about how this happens, and the safeguards applied, please contact us using the details below.

12. How long do we keep your personal information for?

We will only keep your personal data for as long as is necessary for our purposes. In considering how long to keep personal data, we will take into account its relevance to our business and our legal and regulatory obligations.

13. Confidentiality and security of your personal information

We are committed to keeping the personal information you provide us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All those responsible in the day to day management of Foxtrot Hotel, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of the personal data of all users of our website and anyone else we may hold personal data about.

14. How to access your information and your other rights?

You have the following rights in relation to the personal information we hold about you:

Your right of access

If you ask us, we’ll confirm whether we’re processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

Your right to rectification

If the personal data we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to erasure

You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal data with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or object to us processing it. It won't stop us from storing your personal data though. We'll tell you before we lift any restriction. If we've shared your personal data with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

Your right to data portability

You have the right, in certain circumstances, to obtain personal data you've provided us with (in a structured, commonly used and machine-readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

Your right to object

You can ask us to stop processing your personal data, and we will do so, if we're:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- processing your personal data for direct marketing; or
- processing your personal data for research unless such processing is necessary for the performance of a task carried out in the public interest.
- Your rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

Your right to withdraw consent

Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal data, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

15. Changes to this privacy notice

We may make changes to this privacy notice from time to time and you should tell us if your information changes.

To ensure that you are always aware of how we use your personal data we will update this privacy notice from time to time to reflect any changes to our use of your personal data. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes. However, we encourage you to review this privacy notice periodically so that you are aware of how we use your personal data.

16. Changes to your information

It is important that the personal data we hold about you is accurate and current. Please tell us of your personal data changes during your relationship with us.

This Policy was last updated: 30th March 2021