

## **PRIVACY POLICY AND COOKIES POLICY**

We at The Hammer Circle (“**we**” or “**our**” or “**us**”) want to make sure all the personal information we have collected about you is safe and secure whether we collect it through our website at **www.hammercircle.com** (“**Site**”) or from other sources. This Policy sets out our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we have decided that we are not required to do so, but our Data Compliance Manager has overall responsibility for data protection compliance in our organisation. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in the “**Contact**” section below.

### **PRIVACY NOTICES**

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us or in providing services to our members or just managing our relationship with you.

When we hold or use your personal information as a **data controller** (*see below for a description of what this is*) we will provide you with a privacy notice which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

Copies of our current privacy notices can be found below:

- Member privacy notice – available via our website at [www.hammercircle.com](http://www.hammercircle.com)
- Privacy notice for everyone else external to our organisation - available via our website at [www.hammercircle.com](http://www.hammercircle.com)

You are encouraged to check back regularly for updates.

### **THE DIFFERENCE BETWEEN DATA CONTROLLERS/PROCESSORS**

A data controller is a person who controls how personal information is processed and used. A data processor is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller.

This distinction is important. You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use and the right to have certain of your personal information either erased or anonymised, commonly referred to as the right to be forgotten. These rights can generally only be exercised against a data controller of your information.

In most cases we will be a data controller of your personal information. In any case where we are not a data controller this means that you cannot exercise these rights against us directly (i.e. where we only act as a data processor), but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases we will endeavour to inform you who is the data controller of your personal information so that you can direct any such requests to them.

Also it is only a data controller that will provide you with a privacy notice about your personal information, so where we process your personal information as a data controller we will provide you with a privacy notice. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

## HOW DO WE USE YOUR PERSONAL INFORMATION?

We will use your personal information as described in the privacy notice provided to you, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes. To see how we use your personal information, please see our current privacy notices, which can be accessed below:

- Member privacy notice – [www.hammercircle.com](http://www.hammercircle.com)
- Privacy notice for everyone else external to our organisation - [www.hammercircle.com](http://www.hammercircle.com)

## WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

Details of how we disclose your personal information are set out in the relevant privacy notice provided to you, but generally it is where we need to do so in order to run our organisation (e.g. where other people process information for us). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

## HOW LONG DO WE HOLD ON TO YOUR PERSONAL INFORMATION?

Further details of how long we hold onto your personal information for are set out in the relevant privacy notice provided to you, but we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier.

The duration for which we retain your personal information will differ depending on the type of information and the reason why it was collected. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

## WHAT ARE YOUR RIGHTS?

Full details of your rights set out in the relevant privacy notice, but you are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contact**" section below.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and stored by us. However your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we wish to help and would encourage you to contact us to resolve your complaint first.

## LINKING WITH THIRD PARTY SITES

Our Site may, from time to time, contain links to and from other websites, for example of any commercial partners, other regional bodies, advertisers and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

## **SECURITY**

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

## **COOKIES**

Certain parts of our Site use may "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard-drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.

We may use cookies on our Site to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Site you are visiting and to recognise you when you return to the Site. Reading cookies does not give us access to other information on your computer's hard-drive and our Site will not read cookies created by other websites that you have visited.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser settings so that it will refuse cookies, our system may issue cookies when you access the Site.

Please note providers of third party content may also use cookies over which we have no control.

## **LOG FILES**

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

## **CHANGES TO THIS POLICY**

Any changes we may make to this Policy in the future will be posted on our Site. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "**Contact**" section below.

## **CONTACT**

In the event of any query or complaint in connection with the information we hold about you, please email [postmaster@hammercircle.com](mailto:postmaster@hammercircle.com)

Whilst this privacy policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

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