

HALO



COMMUNICATIONS LTD

HALO COMMUNICATIONS PRIVACY POLICY

Halo Communications understands and respects the importance of your privacy. This Privacy Policy outlines how we use the personal data we collect from you, or that you provide to us. Please read the following information carefully.

For the purpose of the GDPR Regulation 2018, we, Halo Communications are the Data Controller and Processor for <https://www.thinkhalo.co.uk> (The Site).

WHAT INFORMATION DO WE COLLECT?

If just browsing The Site, our servers and cookies collect the following generic information about you;

- The Operating System you use e.g. Windows
- The Browser you use e.g. Safari or Google Chrome
- The device you are using to view this website e.g. Desktop or Mobile
- General Demographics e.g. Gender, Age Bracket & Broad Location
- Your IP Address
- Your Behaviour on our Site e.g. Page Views, Link Clicks etc.

Only when **voluntarily** completing a form on The Site, do we then have access to the following information:

- E-mail Address
- First & Last Name
- Telephone Number

HOW WE COLLECT YOUR INFORMATION

DIGITAL

- Cookies (Please refer to the Overview Table in the Cookies section below)
- Newsletter Sign Up Form
- Third-Party Review Sites

OFFLINE

- We may from time to time record telephone calls you have with members or our staff for training purposes and to improve the quality of our service.
- Feedback Surveys
- Competitions

COOKIES

We store cookies on your computer to identify that you have been to our site before, and to personalise certain content based on previous behaviour. We do use third party cookies to track data. We also use remarketing cookies to log when users view specific pages on our site, in order for us to provide targeted advertising in the future.

You can opt out of Google's use of cookies by visiting Google's Ads Settings page: <http://www.google.com/settings/ads>. If you would not like to be tracked during your visit you can install a Do Not Track Plugin for Google Chrome or enable the Do Not Track feature in Firefox.

HOW WE USE YOUR INFORMATION

- To respond to specific enquiries and queries
- For resolving complaints and dealing with disputes
- To notify you about changes to our service
- To ensure that content from our Site is presented in the most effective manner for you and for your computer;
- For preventing and detecting fraudulent or criminal activity
- If you have given us your consent to receive marketing communications by email, are a customer of ours or you have previously asked us for information about our breaks or experiences, we may send you marketing messages by email. However, in every marketing email message we send you, we will give you the opportunity to unsubscribe from our mailings altogether.
- For internal research/analysis and customer profiling.

Please note the usage as outlined above applied to all information we hold about you, however we obtain it during your journey with us.

DISCLOSURE OF YOUR INFORMATION

- We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your

information when we believe release is appropriate to comply with law, enforce our site policies, or protect ours or others rights, property or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising or other uses. We collect GDPR readiness statements from all of our trusted third parties, which are available on request.

- You have the right at any time to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by not ticking certain boxes on the forms we use to collect your data.
- Our third party review administrator(s) (including TripAdvisor) may contact you to ask for your comments on the accommodation and/or services that have been provided

ACCESSING YOUR INFORMATION

- The GDPR Regulation 2018 gives you the right to check that your personal data is being processed lawfully. Your subject access right can be exercised in accordance with the regulation. Any subject access request must be made in writing to info@thinkhalo.co.uk
- If you would like amendments made to your data e.g. change of name or contact details, please contact us at any time via info@thinkhalo.co.uk

DATA SECURITY

The transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to this web site, therefore any transmission is at your own risk.

Once we have received your information, we will take all reasonable steps to keep your personal data secure (both technologically and physically) and to try to prevent any unauthorised access to it. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

EXTERNAL LINKS

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites. This Site may contain links to other websites not controlled by Halo Communications. Halo Communications has no responsibility for the linked websites nor does it necessarily endorse any linked websites. Halo Communications provides links solely for the convenience and information of its Site users. ^[1] Halo Communications provides the materials on this site "as is" without warranties of any kind, either express or implied, including without limitation, warranties of title, implied warranties of merchantability, fitness for a particular purpose or non-infringement of intellectual property. Halo

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USER FEEDBACK POLICY AND OTHER SUBMISSIONS^[L]_[SEP]

All comments, suggestions, ideas, and other submissions disclosed, submitted or offered to Halo Communications on or via this Site or otherwise disclosed, submitted or offered in connection with your use of this Site (collectively, the “Comments”) are property of Halo Communications. Communication, submission or offering of any Comments shall constitute an assignment to Halo Communications of all worldwide rights, titles and interests in all copyrights and other intellectual properties in the Comments. Thus Halo Communications will own exclusively all such rights, titles and interests and shall not be limited in any way in its use, commercial or otherwise, of any Comments. Halo Communications is and shall be under no obligation (1) to maintain any Comments in confidence; (2) to pay to user any compensation for any Comments; or (3) to respond to any user Comments. You agree that no Comments submitted by you to the Site will violate any right of any third party, including copyright, trademark, privacy or other personal or proprietary right(s). You further agree that no Comments submitted by you to the Site will be or contain libelous or otherwise unlawful, abusive or obscene material. You are and shall remain solely responsible for the content of any Comments you make.

SITE CONTENTS^[L]_[SEP]

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INDEMNIFICATION^[L]_[SEP]

You agree to defend, indemnify and hold Halo Communications harmless from and against any and all claims, damages, costs and expenses, including legal fees, arising from or related to your use of the Site.

AMENDMENTS

We reserve the right to update or alter this Privacy Policy from time to time without notice to you.