
USER PRIVACY POLICY

BACKGROUND:

In this Policy, unless specified otherwise, words and phrases shall have the same meanings as specified in Our User Terms and Conditions.

THE GLOBAL RETREAT COMPANY LIMITED, a limited liability company incorporated in England with registration number 10572930, whose registered office is 60 Adam and Eve Mews, London W8 6UJ understands that your privacy as a User is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of Our Users and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when Using Our Website. If you do not accept and agree with this Privacy Policy, you must stop using Our Services immediately.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Cookie”	means a small text file placed on your computer or device by Our Services when you visit certain parts of Our Services and/or when you use certain features of Our Services. Details of the Cookies used by Our Services are set out in Part 14, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003; and
“We/Us/Our”	means the said The Global Retreat Company Limited (as above).

2. Information About Us

- 2.1 Our Services are owned and operated by Us.
- 2.2 Email address: info@globalretreat.co

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies only to Our use of data gathered by Us in any User’s (“**you/ your**”) use of Our Services.

4. What Is Personal Data?

- 4.1 Personal data is defined by the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) (where applicable in relation to the storage retention and processing of EU personal data), the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the “**UK GDPR**”), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of

section 3 of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018 (collectively, “**the Data Protection Legislation**”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

- 4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, a User as an individual has the following rights, which We will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data We hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 15 to find out more. (We only hold personal data for certain periods of time, as explained in Part 8 but if you would like Us to delete it sooner, please contact Us using the details in Part 15). Please note that deletion of certain personal data may prevent Our Services from functioning;
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. For more information please see Part 7.

- 5.2 For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.

- 5.3 It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.

- 5.4 Further information about your rights can also be obtained from the Information

Commissioner's Office or your local Citizens Advice Bureau.

- 5.5 If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.
- 5.6 We would welcome the opportunity to resolve your concerns Ourselves, however, so please contact Us first, using the details in Part 15. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office details of which can be found here <https://ico.org.uk/>.

6. What Data Do We Collect and How?

- 6.1 Depending upon your use of Our Services, We collect and hold some or all of the personal and non-personal data set out below, using the methods also set out in the table. Please also see Part 14 for more information about Our use of Cookies and similar technologies.
- 6.2 We may collect certain "Special Category" data from a User when providing Our Services. Special Category data is:
 - a) personal data revealing racial or ethnic origin;
 - b) personal data revealing political opinions;
 - c) personal data revealing religious or philosophical beliefs;
 - d) personal data revealing trade union membership;
 - e) genetic data;
 - f) biometric data (where used for identification purposes);
 - g) data concerning health/ medical conditions;
 - h) data concerning a person's sex life;
 - i) personal data pertaining to children (any person under the age of 18 years or under a higher age and deemed under the age of full legal responsibility as provided in the User's country or territory of residence); and
 - j) data concerning a person's sexual orientation.

We do not collect Special Category Data unless it is volunteered by a User. If a User volunteers any Special Category Data to Us it is deemed that the User gives explicit consent to the collection, processing, use and retention of such Special Category Data for the purposes of Us providing Our Services to the User.

For information on what Special Category data We may collect as part of Our Services and our lawful basis for the collection and use of this data please see the table below and Part 7 of this Policy.

Our Services are not intended to be used by minors. "Minors" are individuals under the age of 18 (or under a higher age and deemed under the age of full legal responsibility as provided in the User's country or territory of residence)). We may however collect personal data pertaining minors when providing Our Services. We do not collect data pertaining to minors unless it is volunteered by User. If a User volunteers any personal data pertaining minors to Us it is deemed that the User gives explicit consent to the collection, processing, use and retention of such personal data pertaining minors for

the purposes of Us providing Our Services to the User.

For information on the data We may collect pertaining to minors as part of Our Services our lawful basis for the collection and use of this data please see the table below and Part 7 of this Policy.

Data Collected	How We Collect the Data
Identity Information including: name, title, date of birth and gender.	Collected via a form during the registration process for the Services on Our Website/ Platform and stored in Our secure data base.
Contact information including: email addresses and telephone numbers.	Collected via a form during the registration process for the Services on Our Website/ Platform and stored in Our secure data base.
Business information including: job title and profession.	Collected via a form during the registration process on the app and only stored in Our secure data base.
Profile information including: post codes, preferences and login details.	Collected via a form during the registration process for the Services on Our Website/ Platform and stored in Our secure data base.
Technical information including: IP address, web browser type and version, operating system and a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to.	Collected via a form during the registration process for the Services on the Platform and stored in Our secure data base.
Special Category Data including food allergies; dietary requirements which may imply or suggest your religion; mobility requirements; disabilities; and medical conditions.	Collected via a form during the registration process for the Services on the Platform and stored in Our secure data base. This data will only be collected by Us if it is volunteered by the User, We do not actively request this data.
Personal data pertaining to minors travelling with a User including a minor's name and age, Special Category Data and address	Collected via a form during the registration process for the Services on the Platform and stored in Our secure data base. This data will only be collected by Us if it is volunteered by the User, We do not actively request this data.

7. How Do We Use Your Personal Data?

7.1 Under the Data Protection Legislation, We must always have a lawful basis for using personal data. The following table describes how We may use your personal data, and Our lawful bases for doing so:

What We Do/ Lawful Basis/ requirement for collecting personal data	What Data We Use
Providing and managing your	Name, Email, Country of Residence;

access to Our Services.	<p>Technical information including: IP address, web browser type and version, operating system and a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to. This data is anonymised</p> <p>Profile information including: login details.</p>
Personalising and tailoring a User's experience when using Our Services.	<p>Identity Information including: name, title and gender.</p> <p>Business information including: job title and profession.</p> <p>Technical information including: IP address, web browser type and version, operating system and a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to.</p> <p>Profile information including: post codes, preferences and login details</p> <p>Special Category Data including food allergies; dietary requirements which may imply or suggest your religion; mobility requirements; disabilities; medical conditions. This data will only be used by Us if it is volunteered by the User, We do not actively request this data; and</p> <p>Personal data pertaining to minors travelling with a User including a minor's name and age, Special Category Data and address. This data will only be used by Us if it is volunteered by the User, We do not actively request this data;</p>
Administering Our Services.	<p>Identity Information including: name, title, date of birth and gender.</p> <p>Profile information including: preferences and login details.</p> <p>Special Category Data including food allergies; dietary requirements which may imply or suggest your religion; mobility requirements; disabilities; and medical condition; This data will only be used by Us if it is volunteered by the User, We do not actively request this data;</p> <p>Personal data pertaining to minors travelling with a User including a minor's name and age, Special Category Data and address. This data will only be used by Us if it is volunteered by the User, We do not actively request this data;</p> <p>Contact information including: email addresses and telephone numbers.</p>
Supplying Our Services.	<p>Identity Information including: name, title, date of birth and gender.</p> <p>Technical information including: IP address, web browser type and version, operating system and a list of URLs starting with a referring site, your activity on Our Services, and the site you exit to.</p>

	<p>Profile information including: post codes, preferences and login details. Special Category Data including food allergies; dietary requirements which may imply or suggest your religion; mobility requirements; disabilities; and medical conditions. This data will only be used by Us if it is volunteered by the User, We do not actively request this data;</p> <p>Personal data pertaining to minors travelling with a User including a minor's name and age and address; This data will only be used by Us if it is volunteered by the User, We do not actively request this data;</p> <p>Contact information including: email addresses and telephone numbers.</p>
Communicating with a User.	<p>Contact information including: Name, title, email addresses and telephone numbers.</p> <p>Profile information including: preferences and login details.</p>
Supplying a User with information that a User has opted-in-to (you may opt-out at any time by unsubscribing using the links provided in Our emails.	<p>Contact information including: Name, title, and email addresses and telephone numbers.</p> <p>Profile information including: post codes, preferences and login details.</p>

- 7.2 With your permission and/or where permitted by law, We may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on Our products and Services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.
- 7.3 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 15.
- 7.4 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 7.5 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will We Keep Your Personal Data?

- 8.1 We do not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the

following periods (or its retention will be determined on the following bases):

We retain personal data pertaining to a User (including any Special Category data a User has volunteered to Us) for as long as you engage Us to provide ServicesUser and for a period of 18 months thereafter. Data will then be deleted or anonymised.

a) We retain personal data pertaining to minors including any Special Category data pertaining to a minor a User has volunteered to Us for for as long as you engage Us to provide Services and for a period of 18 months thereafter. Data will then be deleted or anonymised.

9. How and Where Do We Store or Transfer Your Personal Data?

9.1 We will store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

9.2 In order to provide you with certain Services some of your personal data including certain Special Category Data and data pertaining to minors may be transferred to the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

9.3 In order to provide you with certain Services some of your personal data including certain Special Category Data and data pertaining to minors may be transferred to countries outside of the UK and the EEA. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and the EEA and under the Data Protection Legislation as follows:

a) We will transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the UK Information Commissioner's Office or the equivalent data protection agency in your jurisdiction; or

b) We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner's Office.

9.4 Please contact Us using the details below in Part 15 for further information about the particular data protection safeguards used by Us when transferring your personal data to a third country.

9.5 The security of your personal data is essential to Us, and to protect your data, We take a number of important measures, including the following:

a) limiting access to your personal data to those employees, agents, contractors, and other third parties, including Retreats, with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

b) procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to,

your personal data) including notifying you and/or the Information Commissioner’s Office where We are legally required to do so;

- c) Only collecting, storing, processing and using Special Category Data and data pertaining to minors in terms of this Policy, utilising strict principals in line with the Data Protection Legislation for minimising the collection, storage, processing and use of such data and maintaining strict rules in relation to deletion and anonymisation of such data.

10. Do We Share Your Personal Data?

- 10.1 If We sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.
- 10.2 In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 10.3 We may share your personal data with other companies in Our group for administration and company management purposes. This includes subsidiaries.
- 10.4 We sometimes contract with the following third parties to process data to supply certain products and services and process data on Our behalf:

Recipient	Activity Carried Out	Sector	Location of Data
Retreats	providers of retreats as part of the Retreat Services	the provision of accommodation, food and beverage and related services	UK, EEA and Globally depending upon the Retreat Services
Klaviyo, Inc.,	providing Our secure database and used for contacting Users in relation to the Services and providing you with customised marketing (where Users have permitted Us to do so).	customer management and marketing platform	UK, EEA and Globally, including the US but certified under EU-US Data Privacy Framework and UK – US Data Bridge https://www.klaviyo.com/legal/data-processing-agreement

- 10.5 If any of your personal data is shared with a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party’s obligations under the law, as described above in Part 9.
- 10.6 If any personal data is transferred outside of the UK, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK/ EEA and under the Data Protection Legislation, as explained above in Part 9.

11. **How Can I Control My Personal Data?**

- 11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Services, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails).
- 11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. **Can I Withhold Information?**

- 12.1 You may restrict Our use of Cookies. For more information, see Part 14.

13. **How Can I Access My Personal Data?**

- 13.1 If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
- 13.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.
- 13.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.
- 13.4 We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

14. **How Do We Use Cookies?**

- 14.1 Our Services may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 14.2 By using Our Services you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. For more details, please refer to section 6, above, and to section 14.6 below. These Cookies are not integral to the functioning of Our Services and your use and experience of Our Services will not be impaired

by refusing consent to them.

- 14.3 All Cookies used by and on Our Services are used in accordance with current Cookie Law.
 - 14.4 Before Cookies are placed on your computer or device, you will be shown a Cookies consent pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Services may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.
 - 14.5 Certain features of Our Services depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 14.7. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 14.9, but please be aware that Our Services may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
 - 14.6 Our Services use analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Services is/are used. This, in turn, enables Us to improve Our Services. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Services, it does enable Us to continually improve Our Services, making it a better and more useful experience for you.
 - 14.7 Please follow the link below for a list of the first party and third party Cookies We use:
<https://www.theglobalretreatcompany.com/cookie-policy>.
 - 14.8 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
 - 14.9 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Services more quickly and efficiently including, but not limited to, login and personalisation settings.
 - 14.10 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.
15. **How do you Contact Us?**
- 15.1 To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:
Email address: info@globalretreat.co

16. Changes to this Privacy Policy

- 16.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.
- 16.2 Any changes will be immediately posted on this privacy-policy. If the changes materially affect the way in which We collect, process, retain or store your personal data, you will be required to accept these revised Terms. Any minor changes will be deemed to have been deemed to have been accepted on your first use of Our Services following the minor alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 8th February 2024.