



# af Thinking & Learning Company Ltd Privacy Notice

## How We Use Your Information

This Privacy Notice will tell you how The Stables Business Centre uses personal data about its clients. A summary of the key and routine activities is included below:

### 1. Who are we?

The Stables Business Centre is a service provided by af Thinking & Learning Company (afTLC) Ltd. The service provision includes meeting room hire, office rental and events. The Centre is located at Wychbold in Worcestershire.

### 2. Why do we collect your information?

The Stables Business Centre collects your personal information so that we can send out newsletters about events we are hosting, updates on our services and special offers.

### 3. What information do we collect and record?

- a. Information is collected when you register with us on our website or request information about room hire, office rental or events. We will collect your name and email contact details and add them to our database. We will send you a formal request as to whether you would like to receive our regular newsletter updates. If you decide no, then we will remove your information from our database.
- b. If you contract our services and make a payment, we will also collect your payment information. We will not keep this information

For information on cookies, please see the detail section A below.

### 4. Where do we receive information about you from?

The information recorded by afTLC Ltd is collected directly from your organisation or an individual registering on your organisation's behalf.

### 5. What if you do not provide information to us?

If you do not provide your information, you would be unable to register for courses or register for our newsletter. You would not be able to receive offers or enter competitions that we schedule from time to time.

### 6. Who do we share information with?

Your information is never shared with third party organisations.

### 7. International Transfers

Your information is secured under European data protection laws at all times and not transferred to organisations beyond this area. Our website security has been updated.

### 8. How long do we keep your information?

We retain your business contact information for 6 years after your last booking. This is stored on our electronic bookkeeping service (Iris open books).

If you opt in to our newsletter service, we will keep your name and email address on our MailChimp service until you unsubscribe. When you unsubscribe, your name and email are deleted from the database immediately.

We are required by law to keep your course record information for 3 years.



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### 9. What rights do you have?

Your exact rights will depend on the nature of information being processed, however your rights may include access, correcting your information or deleting/unsubscribing.

If we have collected your consent, you can withdraw this at any time

Please see the detail section B below for a full explanation of your rights.

### 10. Is there any automated processing of your information?

Your information may be automatically processed and profiled to assess your interests and likes to personalise the information we send out to you.

### 11. Further Enquires and Complaints?

Complaints about the use of your information should be addressed to:

Andrew Frapwell  
Person responsible for Data Protection  
af Thinking & Learning Company Ltd  
The Stables Business Centre  
Walnut Tree House  
Astwood Lane  
Wychbold  
Worcestershire  
WR9 0BU

## Further information

### A. Cookies

#### What are 'Cookies'?

Cookies are small pieces of information that are stored by your browser on your device or computer. They are often used as a mechanism for websites to remember things that a website browser has done there in the past, for example, clicking on particular buttons, logging in, or having read pages on that site months or years ago.

#### How does afTLC Ltd use Cookies?

In common with many other website operators, we use cookies on our website. We use them to enrich your experience of using the website by allowing us to tailor what you see to what we have learned about your preferences during your visits to the site. Our cookies are also used to enable us to develop our website to reflect the interests of our site visitors by noting who has seen which pages and promotions, how frequently particular pages are visited and determining the most popular areas of our website.

#### In general, we use the following types of cookie:

**Strictly Necessary Cookies:** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website and purchase online goods or services.



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**Analytical/Performance Cookies:** These allow us to recognise and count the number of visitors and see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users can find what they are looking for easily.

**Functionality Cookies:** These are used to improve the functional performance of the website and make it easier for you to use. For example, they are used to remember that you have previously visited the website and asked to remain logged in to the website. These may collect your personal identifiable information such as your name and email.

**Targeting Cookies:** These cookies record your visit to our website and your browsing habits, such as the pages you have visited and the links you have followed. They are used to deliver content and messaging which is more relevant to your interests. These cookies do not contain your personal identifiable information. For details on how to manage cookies see below.

By continuing to use our website you agree that we can place these types of cookies on your device.

### Managing Cookies

You can manage cookies by choosing the setting on your internet browser that allows you to refuse the setting of all or some cookies.

If you refuse cookies this may mean that you can't use some of the additional features of our website and may not be able to access certain areas of the website.

## B. Your rights

### What rights do you have?

You have a number of rights under the General Data Protection Regulation.

Your rights are:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to object
- Right to restrict processing
- Right to data portability

Please note that not all rights apply in all circumstances.

All rights must be resolved by afTLC Ltd within one month, unless an extension of up to two additional months is applied, or a different timeframe is stated below.

### Right to be informed

You have a right to be informed about uses of your information with an emphasis on transparency. This notice, in support of other privacy notices published by afTLC Ltd ensures that your right to be informed is achieved.



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### Right of access

You have a right to receive:

- Confirmation of what information is recorded about you
- Confirmation of how your information is used
- Access to your information
- You will be required to provide proof of identification and may be asked to specify exactly what information you require.

To request information please contact the Data Protection Officer (see section 11).

### Right to rectification

Rectification refers to correcting factual inaccuracies or incomplete data which is held by afTLC Ltd.

To rectify your information please contact the Person responsible for Data Protection (see section 11).

### Right to erasure

In some circumstances you can request that your information is deleted.

This right will apply if you have consented to your information being used and have later withdrawn consent, or the information has been processed as part of the legitimate interests of afTLC Ltd – see section 2 Why do we collect your information? for details.

There may be consequences of erasing your data, such as being unable to make further purchases or access member only content on the website. Please carefully consider why you want to erase data and what the impact will be. There would be no way to retrieve your data once it is deleted.

To erase your personal information, or discuss this right further, please contact the Person responsible for Data Protection (see section 11).

There are exceptions to this right which would be explained to you, including information required to exercise or defend a legal claim and information which is exempt as freedom of expression.

### Right to object

You can object to your information being used for:

- Marketing (MailChimp)
- Scientific or historical research
- Statistical purposes

You can object to marketing and opt-out at any time in your account preferences. Marketing will stop immediately.

To object to research or statistical processing, which afTLC Ltd would only undertake in aggregate so that no one is individually identified, or if you want to object to marketing in writing, please contact the Person responsible for Data Protection (see section 11).

### Right to restrict processing

The right to restrict processing means that if you have disputed the accuracy of information, objected to its use or want afTLC Ltd to retain your information, you can request it is stored but no other uses are permitted.



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### **Right to data portability**

The right to data portability allows you to obtain your personal data from an organisation and reuse this for your own interests with other, similar organisations. It is intended to allow consumers to understand their usage of services and get the best deal.

The right to data portability is unlikely to apply to information held by afTLC Ltd, however you will be informed when the right does apply.