

Pentameter Ltd. Privacy Policy

22/05/2019

Background:

Pentameter Limited understands that your privacy is important to you and that you care about how your information is used and shared online. We are committed to respecting your privacy and to complying with applicable data protection and privacy laws.

This privacy policy has been created to inform you of the information we collect, how this information is used, what steps we take to protect this information, as well as providing you a process to update, change or delete your personal data. We will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

This Policy applies to our use of any and all data collected by us in relation to your use of our website. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our website. If you do not accept and agree with this Privacy Policy, you must stop using our website immediately.

You can visit our website without disclosing any personally identifiable information about yourself (although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity - see our cookie policy for detailed information).

If you do submit personal information booking an experience or completing a web form registration, for example, you can be assured that we will use your personal information only to support your continuing relationship with Pentameter Ltd.

We have provided this Privacy Policy Statement to help you understand how we collect, use and protect your information when you visit our websites and when you generally use our products and services.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

1. Definitions and Interpretation

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

“Account” means an account required to access and/or use certain areas and features of our website;

“Cookie” means a small text/image file placed on your computer or device by our website when you visit certain parts of our website and/or when you use certain features of our website. Details of the Cookies used by our website are set out in section 15, below;

“our website”
means this the website, www.pentameter.co;

“United Kingdom and EU Cookie Law” means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015;

“We/Us/Our” means Pentameter, a limited company registered in England and Wales under Company Number #10751668, whose registered address is 56 Park Road, Wilmslow SK9 5BT

2. Information About Us

1. Our website, Pentameter.co is owned and operated by Pentameter, a limited company registered in England and Wales under Company Number 10751668, whose registered and main trading address is The Shed, Chester St, Manchester M1 5GD

3. Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of our website. It does not extend to any websites that are linked to from our

website (whether we provide those links or whether they are shared by other users). We have no control over how your data is

collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before

providing any data to them.

4. What Data Do We Collect?

Some data will be collected automatically by our website (for further details, please see section 15 on Our use of Cookies),

other data will only be collected if you voluntarily submit it and consent to Us using it for the purposes set out in section 5, for

example, when signing up for an Account. Depending upon your use of our website, We may collect some or all of the following

data:

1. Name;
2. Date of birth;
3. Contact information such as email addresses and telephone numbers;

4. Registered address
5. Demographic information such as gender, preferences and interests;
6. Medical, dietary and outdoor experience information as applicable for a trip;
7. IP address (automatically collected);
8. Web browser type and version (automatically collected);
9. Operating system (automatically collected);
10. A list of URLs starting with a referring site, your activity on our website, and the site you exit to (automatically collected);

If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at

which it was collected, and subject to any preferences indicated by you.

Non-personal Identifying Information

We may also collect non-personal identifying information about your visit to our website based on your browsing activities

using Google Analytics. This information may include the pages you browse and products and services viewed or ordered for

example. This helps us to better manage and develop our websites, to provide you with a more enjoyable, customised service

and experience in the future, and to help us develop and deliver better products and services tailored to your individual

interests and needs.

From time to time, if you consented accordingly we may also store and use your information to contact you for market research, marketing, information and customer service purposes. We may contact you by email, phone, mail or social media

platforms as indicated by you.

5. How Do We Use Your Data?

1. All personal data is stored securely in accordance with the EU [General Data Protection Regulation \(Regulation \(EU\) 2016/679\)](#) (GDPR). For more details on security see section 6, below.

2. We use your data to provide the best possible products and services to you. This includes:

1. Providing and managing your booking(s);
 2. Providing and managing your access to our website;
 3. Personalising and tailoring your experience on our website;
 4. Supplying our products and services to you;
 5. Personalising and tailoring our products and services for you;
 6. Responding to communications from you;
 7. Supplying you with email newsletters and offers, that you have subscribed to (you may unsubscribe or opt-out at any time)
 8. Analysing your use of our website [and gathering feedback] to enable us to continually improve our website and your user experience;
 9. Administrating debt recoveries
 10. Verifying your identity when required (you may lose your password or security information for example, and we may then need to ask you for other 'identifiable' information to protect your data from unauthorised access)
3. In some cases, the collection of data may be a statutory or contractual requirement, and We will be limited in the products and services We can provide you without your consent for Us to be able to use such data.
4. With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email and telephone and text message and post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
5. Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:
1. you have given consent to the processing of your personal data for one or more specific purposes;
 2. processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
 3. processing is necessary for compliance with a legal obligation to which we are subject;
 4. processing is necessary to protect the vital interests of you or of another natural person;

5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or

6. processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such

interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

6. How and Where Do We Store Your Data?

1. We only keep your data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it. Your data will be deleted if we no longer need it.

2. Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).

3. Some or all of your data may be stored or transferred outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using our website and submitting information to Us. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between Us and any third parties We engage and the use of the EU-approved Model Contractual Arrangements.

4. Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our website.

5. Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet, email and any electronic means.

7. Do We Share Your Data?

1. We do not share your data.

2. We may contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

3. We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.

4. In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings, where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

8. What Happens If Our Business Changes Hands?

1. We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.

2. In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

9. How Can You Control Your Data?

1. When you submit information via our website, you may be given options to restrict Our use of your data. We aim to give you strong controls on Our use of your data including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails or by managing your Account.

2. You may also wish to sign up to one or more of the preference services operating in the United Kingdom. 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.

10. Your Right to Withhold Information and Your Right to Withdraw Information After You Have Given it

1. You may access certain areas of our website without providing any data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data.

2. You may restrict your internet browser’s use of Cookies. For more information, see section 15 and Our Cookie Policy.

3. You may withdraw your consent for Us to use your personal data as set out in section 5 at any time by contacting Us using the details set out in section 15, and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to provide the best possible products and services to you.

11. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact Us for more details at hello@pentameter.co, or write to us, Data Protection Officer, Pentameter, Innospace, The Shed, Chester St, Manchester M1 5GD

Please quote your name and address together with your mobile and /or booking information (if relevant). We would be grateful if could also provide brief details of what information you want a copy of (this helps us to more readily locate your data.)

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

12. Information Security

Pentamer Ltd recognises that its customers are increasingly concerned about how companies protect personal information from misuse and abuse and about privacy in general. Pentameter Ltd is constantly reviewing and enhancing its technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction. We use industry standard TLS certificates to provide encryption of data in transit, for example, all access to Pentameter Ltd's website and management portals is covered by HTTPS.

Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. Pentameter Ltd cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

13. Privacy Support

Pentameter Ltd reserves the right to amend or modify this Privacy Policy Statement at any time and in response to changes in applicable data protection and privacy legislation.

If we decide to change our Privacy Policy, we will post the changes on our website so you know what information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether or not we are able to use your information in this different manner.

If you have any enquiry about Pentameter Ltd's privacy policy or practices, please write to: Data Protection Officer, hello@pentameter.co or Data Protection Officer, Pentameter Ltd, Innospace, The Shed, Chester St, Manchester M1 5GD

14. Monitoring and/or Recording of All Your Communications

Monitoring or recording of your calls, emails, text messages and other communications may take place in accordance with UK law, and in particular for business purposes, such as for quality control and training, to prevent unauthorised use of Pentameter Ltd's websites, to ensure effective systems operation and in order to prevent or detect crime.

15. What Cookies Do We Use and What For?

1. Our website 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

website and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

2. By using our website 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. We use third party Cookies on our website for advertising services. These Cookies are not integral to the functioning of our website.

3. All Cookies used by and on our website are used in accordance with current English and EU Cookie Law.

4. Certain features of our website depends on Cookies to function. Your Country and EU Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings, but please be aware that our website may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

5. Our website uses various analytical services. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use our website. This, in turn, enables Us to improve our website and the products and services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of our website, it does enable Us to continually improve our website, making it a better and more useful experience for you.

6. The analytics service(s) used by our website use(s) Cookies to gather the required information. Certain of these Cookies may be placed immediately when you first visit our website and it may not be possible for Us to obtain your prior consent.

7. 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.

8. You can choose to delete Cookies at any time however you may lose any information that enables you to access our website more quickly and efficiently including, but not limited to, login and personalisation settings.

9. 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.

10. We collect information through cookies to ensure the content of the website and the website pathways work as effectively as possible. We use the following cookies to help us achieve this. Strictly necessary cookies. These are cookies that are required for the operation of our website and are completely anonymous. Below are examples of when or why we will use these cookies:

1. To help the website to function and enhance the look and feel of the website;

2. To ensure you are always provided with a quick and responsive browsing experience;

3. Our web servers to respond to your actions on the website or browsing the website. The website would not be able to work without it; and

4. They also help to improve navigation around our website and allow you to return to pages you have previously visited.

5. Analytical/performance cookies. Allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works. Below are examples of when we will use these cookies:

6. Statistical information and log data about the number of visits to certain pages on the site;

7. The pages you viewed and activities you carried out during your visit;

8. The time and date of your visit;

9. The duration you stayed on a certain page; and

10. The path taken whilst on the site.

11. Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences. Below are examples of when we will use these cookies:

12. As soon as you visit the website, a cookie on your device will identify you have returned to the website and record your preferences;

13. Remembering your choice of language or region; and

14. When submitting a comment to one of our blogs, the information you enter is remembered in order to make it easier for you to comment next time. By using our website you agree to us placing the cookies specified above on your device (phone, android, computer, mac etc.).

16. Summary of Your Rights under GDPR

Under the GDPR, you have:

1. the right to request access to, deletion of or correction of, your personal data held by Us;

2. the right to complain to a supervisory authority;

3. be informed of what data processing is taking place;

4. the right to restrict processing;

5. the right to data portability;

6. object to processing of your personal data;

7. rights with respect to automated decision-making and profiling (see section 17 below).

To enforce any of the foregoing rights or if you have any other questions about our website or this Privacy Policy, please contact Us using the details set out in section 18 below.

17. Automated Decision-Making and Profiling

17.1 In the event that We use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on You, You have the right to challenge such decisions under GDPR, requesting human intervention, expressing Your own point of view, and obtaining an explanation of the decision from Us.

17.2 The right described in section 17.1 does not apply in the following circumstances:

1. The decision is necessary for the entry into, or performance of, a contract between You and Us;
2. The decision is authorised by law; or
3. You have given you explicit consent.

18. Contacting Us

If you have any questions about our website or this Privacy Policy, please contact Us by email at hello@pentameter.co, by telephone on 0161 8211 200, or by post at Pentameter, The Shed, Chester St, Manchester M1 5GD

. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

19. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our website and We will email you with a link to the updated Privacy Policy once we have made any changes. You will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.