PRIVACY POLICY

Background:

Thorns Group understands that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and 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 Site. 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 Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

Definitions and Interpretation

1.1 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 Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
Our Site	means this website, thorns.co.uk;
"UK 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; and
"We/Us/Our"	means Thorns Group, a limited company registered in England under 12874167, whose registered address is 37 Finedon Station Road, Isham, Northants, NN9 5NX

2. Information About Us

Our Site, thorns.co.uk, is owned and operated by Thorns Group, a limited company registered in England under 12874167, whose registered address is 37 Finedon Station Road, Isham, Northants, NN9 5NX

3. Scope – What Does This Policy Cover

This Privacy Policy applies only to your use of Our Site. It does not extend to any websites that are linked to from Our Site (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 Site for further details, please see section 12 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 Site, We may collect some or all of the following data:

- Name;
- contact information such as email addresses and telephone numbers;
- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected);
- a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);
- information relating to your request to us

5. How Do We Use Your Data?

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.

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

- Providing and managing your access to Our Site;
- Personalising and tailoring your experience on Our Site;
- Supplying Our services to you;
- Responding to communications from you;
- Supplying you with email newsletters, that you have subscribed to (you may unsubscribe or opt-out at any time by contacting us
- Analysing your use of Our Site [and gathering feedback] to enable Us to continually improve Our Site and your user experience;

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.

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 with information, news and offers on Our 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.

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:

- you have given consent to the processing of your personal data for one or more specific purposes;
- 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;
- processing is necessary for compliance with a legal obligation to which we are subject;
- processing is necessary to protect the vital interests of you or of another natural person;
- 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

- 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?

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. In any event, We will conduct an annual review to ascertain whether we need to keep your data. Your data will be deleted if we no longer need it in accordance with the terms of our Data Retention Policy.

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).]

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 Site.

Steps We take to secure and protect your data include:

- https security, regular website security scans and updates.

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.

7. Do We Share Your Data?

We may contract with third parties to supply 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.

We may compile statistics about the use of Our Site 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.

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?

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.

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?

When you submit information via Our Site, 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 and sending us a message through our website.

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.

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

You may access Our Site without providing any data at all.

You may restrict your internet browser's use of Cookies. For more information, see section 12

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 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 through our website, or using the contact details below in section 14.

12. What Cookies Do We Use and What For?

12.1 Our Site 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 Site and to provide and improve Our services. For more details, please refer to section 5, above, and to section 12.6 below. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using Our Site 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 Site for web analytics. For more details, please refer to section 5, above, and to section 12.6 below. These Cookies are not integral to the functioning of Our Site.

12.3 All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law.

12.4 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and the 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 Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

12.5 The analytics service(s) used by Our Site use(s) Cookies to gather the required information. Certain of these Cookies may be placed immediately when you first visit Our Site and it may not be possible for Us to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below in section 12.10.

Name of Cookie	**First / Third Party**	**Provider**	**Purpose**
_ga	First	Google	distinguish users
_gid	First	Google	distinguish users
gtm	First	Google	throttle request rate
AMP_TOKEN	First	Google	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
gac<property-id>	First	Google	Contains campaign related information for the user.

12.6 The analytics service(s) used by Our Site use(s) the following Cookies:

- 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.

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

- 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.

13. Summary of Your Rights under GDPR

Under the GDPR, you have;

On termination of the Contract for any reason:

- the right to request access to, deletion of or correction of, your personal data held by Us;
- the right to complain to a supervisory authority;
- be informed of what data processing is taking place;
- the right to restrict processing;
- the right to data portability;
- object to processing of your personal data;
- rights with respect to automated decision-making and profiling (see section 14 below).

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Policy, please contact Us using the details set out in section 15 below.

14. Automated Decision-Making and Profiling

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 to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from Us.

The right described in section 14.1 does not apply in the following circumstances:

- The decision is necessary for the entry into, or performance of, a contract between the You and Us;

- The decision is authorised by law; or
- You have given you explicit consent.

Where We use your personal data for profiling purposes, the following shall apply:

- Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- Appropriate mathematical or statistical procedures will be used;
- Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at hello@thorns.co.uk, by telephone on 0208 801 4444 or by post at Data Protection Officer, 37 Finedon Station Road, Isham, Northants, NN9 5NX. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

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 Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is High Noon Hospitality Services Limited of 37 Finedon Station Road, Isham, Northants, NN9 5NX