

# JUNKYARD GOLF CLUB

## CUSTOMER PRIVACY POLICY

### ABOUT US

Junkyard Golf Club is currently located in Manchester, Oxford and London (**our venues**). Our venues are operated by the Junkyard Golf group of companies, including Golf, Eats and Booze Limited, Junkyard Golf Club Limited, Junkyard Golf Club (Leeds) Limited, Junkyard Golf Club (Liverpool) Limited, Junkyard Golf Club (Oxford) Limited and Junkyard Golf Club (Manchester) Limited (the **Junkyard Golf Club Group**). This website [www.junkyardgolf.co.uk](http://www.junkyardgolf.co.uk) (**our site**) is operated by the Junkyard Golf Club Group.

References in this Privacy Policy to “**we**”, “**us**” and “**our**”, are to the Junkyard Golf Club Group.

The purpose of our site is to provide you, as a user of our site and/or a prospective, current or former customer, with information about our venues, the different crazy golf courses we offer and the food and drink options available at our venues. We also link to a third party website which allows you to buy tickets for our venues. This Privacy Policy is designed to give you information about how we obtain and process your personal data in connection with your use of our site and Wi-Fi network, when at our venues and/or when you purchase goods and services from us.

We are responsible for deciding how we hold and use personal information about you. We are committed to protecting and respecting your privacy and ensuring that personal and sensitive information is gathered in compliance with this Privacy Policy.

We may collect, use, store and transfer different kinds of personal data about you when you use this site and/or our products and services at one or more of our venues. Examples of when we would collect your personal data, include if you subscribe to receive marketing emails from us, fill in an enquiry form on the Group Bookings page of our site, purchase a ticket for one of our venues (either online via our site (which will redirect you to a third party ticketing company’s website) or in person at our venue) and/or if you make use of the complimentary Wi-Fi service at our venues.

Please read this Privacy Policy carefully (together with our **Cookies Policy**). From time to time we may also issue other privacy or fair processing notices to you relating to the way in which we collect personal data about you which we will publish on our site.

### HOW TO CONTACT US

Golf, Eats and Booze Limited is the “**data controller**” in respect of your personal data for the purposes of data protection legislation. Golf, Eats and Booze Limited is a limited company registered in England and Wales under company number 10374429. Our registered office is at 82 The Greenhouse, MediaCityUK, Salford M50 2EQ UK.

If you have any questions or concerns about any information contained within our Privacy Policy, please email us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk).

### THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information relating to an identifiable individual. It does not include any data or information which relates to a person that cannot be identified or where the person’s identity has been removed (i.e. anonymous data).

As a customer at our venues or visitor to our site, we may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity data**  
Data which identifies you, including your name and date of birth
- **Contact data**  
Your contact details, such as your address, telephone number and email address
- **Financial data**  
Data we collect if you purchase tickets from us, such as your bank account and payment card details
- **Transaction data**  
Details about any purchases you have made from us



- **Marketing data**

Data which we capture when you sign up to our VIP Club, including your preferences regarding receiving marketing communications from us

- **Usage data**

Information about how you use our site and our products and services including how you navigate our site and if you encounter any problems

- **Technical data**

Electronic information which is automatically logged/stored by processing equipment, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our site

- **Social media data**

Data we have access to through a social media platform when you connect with us or like or follow our social media accounts, including your social media handle, photograph, date of birth, location, occupation, interests and other information and content you make available via your social media accounts

- **CCTV data**

Information obtained through CCTV.

We may also collect, use and share “**aggregated data**” such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature on our site. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not ordinarily collect or process **special categories of personal data** about you as a customer at our venue or visitor to our site (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, information about your health and genetic and biometric data), except if you have an accident or are injured at one of our venues. In the unlikely event this happens, we will need to keep a record of your injury for the purpose of ongoing compliance with health and safety legislation and for the purpose of any resulting legal claims. We will minimise the special category data we collect so far as possible and we will make you aware when we collect this type of data.

We do not collect any information about criminal convictions and offences (**criminal data**).

## HOW WE COLLECT INFORMATION

### Direct interactions

The majority of the personal data we hold about you is collected when you interact with us or correspond with us directly (via our site, by email, telephone, post, at our venues or otherwise). This includes personal data you provide when you:

- Fill out an enquiry form on the Group Bookings page of our site;
- Send us an email;
- Enquire about our venues, products or services;
- Purchase a ticket;
- Subscribe to receive marketing communications;
- Input data into one of our iPads at a promotional event.

### Automated technology

When you interact with our site, our systems will automatically collect information about your equipment, browsing actions and patterns. We collect this personal data (namely technical and usage data) by using cookies [server logs and other similar technologies]. Please see our [Cookies Policy](#) and the section headed “Cookies” below. In addition, our CCTV systems may capture your image automatically if you visit one of our venues. [We will not typically connect this CCTV data with other personal data we hold about you, unless you or someone else has been injured or there has been another incident you were involved in which requires investigation (such as damage to our venue).] Please refer to our CCTV Policy for further information.

### Other third parties

We may also receive personal data about you from various third parties as set out below:

- The third party designated to process and manage our online ticketing operations (currently TicketCo UK Limited). If you want to purchase a ticket for our venues online, you will be redirected to our ticketing company’s website to process the payment and issue the tickets.



- The operator of our Wi-Fi network at our venues (currently Korubu Limited). If you connect to our free Wi-Fi whilst at our venue, you will be asked to provide some identity and contact data which will be collected by the Wi-Fi operator and shared with us. The Wi-Fi operator may also collect usage and technical data from you.
- The operator of our photo booths at our venues (currently LOOKLOOK). If you use our photo booths, you will have the option of subscribing to our mailing list by providing some identity and contact data, which will be collected by the photo booth operator and shared with us.
- We will receive usage and technical data from the following third parties:
  - Analytics providers, such as Google Analytics and Hot Jar;
  - Advertising networks, such as Google Adwords.
- We will obtain social media data from the operators of social media platforms, including Facebook, Instagram, Twitter and YouTube who are based inside and outside of the EU.

## HOW AND WHY WE USE YOUR PERSONAL INFORMATION

We will only collect and process your personal data where we have a legal basis to do so. This legal basis will vary depending on the manner and purpose for which we are collecting your personal information. We will use your personal information as follows:

- Where it is necessary for the **performance of a contract** to which you are a party or to take steps at your request before entering into such a contract (eg where you are a customer at one of our venues we will need to send you your tickets (if purchased online) and process your financial data to take payment for the tickets);
- Where it is necessary to **comply with a legal or regulatory obligation** that we are subject to (eg health and safety legislation);
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests (see below); and
- Where we have your **consent** to do so, subject to your right to withdraw consent (further details provided in the section headed “Your rights” below).

Our legitimate interests in processing your personal data for our own business purposes include (without limitation):

- To provide and improve our products and services and to operate our venues;
- To process your order for tickets, including managing payments and collecting and recovering money owed to us;
- To respond to an enquiry from you submitted to us via the Group Bookings page of our site or social media accounts or by post, email, telephone or in person at our venues;
- To administer and protect our business, our site and Wi-Fi network (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- To use data analytics to improve our site, services, marketing, customer relationships and experiences;
- To deliver relevant website content;
- To manage our relationship with you and notify you of changes to our terms and conditions or privacy policy;
- To promote our services, including sending discounts and information about our venues by email (such as offers around your birthday);
- To monitor and improve the effectiveness of our marketing communications, which may include monitoring or tracking responses and engagement;
- To fulfil our legal, regulatory and risk management obligations, including for the purpose of establishing, exercising or defending legal claims;
- To ensure our site, Wi-Fi network and venues are being used in compliance with relevant terms and conditions;
- For fraud prevention, anti-money laundering, and for the prevention or detection of crime;
- To maintain our CCTV systems for the purpose of ensuring the safety and security of our people and premises.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you require further detail about the specific legal ground we are relying on to process your personal data.



## MARKETING

### Marketing communications from us:

We may send you marketing communications by email if you:

- Have subscribed to receiving marketing communications from us on our site;
- Have opted-in to marketing communications when using our free Wi-Fi system at our venues; or
- Have otherwise consented to receive marketing communications from us.

### Third party marketing:

We will not sell your data to any third parties.

### Opting out:

You can ask us to stop sending you marketing communications at any time, by:

- Clicking on the unsubscribe button in the footer of any marketing email from us; or
- Contacting us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk).

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we wish to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data from you in order to comply with our legal obligations or to perform a contract we have with you and you fail to provide that data when requested, we may not be able to perform the relevant contract (for example, to send you tickets or process your payment). In this case, we may have to cancel the relevant contract.

## HOW WE PROTECT YOUR PERSONAL DATA

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

In addition, the personal information you provide to us is only available to authorised personnel of Junkyard Golf who need access to the information in order to fulfil their duties. They will only process your personal information on our instructions and they shall be subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Once we no longer require your personal information, we will take reasonable steps to destroy it in a secure manner.

## HOW LONG WE HOLD YOUR PERSONAL DATA FOR

We will only hold your personal information for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Our retention periods take into account legal and regulatory requirements and are subject to change. If you have any questions in this regard, please contact us using the contact details set out in this Privacy Policy.

Where you have provided consent for us to re-post an image from your social media account, we will keep the re-posted image on our internal database for 30 days after it was re-posted on our social media account. The re-posted image will remain accessible through our social media account indefinitely (or in line with the policy of the relevant social media platform), unless you instruct us or the social media platform to delete it.



We will retain any special category personal data collected in connection with an accident or injury suffered at one of our venues (as described above) for a period of three years for the purposes of dealing with any resulting legal claims and for the purposes of complying with our statutory reporting obligations (or such longer period as may be required by law).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) in order to develop our business methods and strategy or for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

We shall not have any liability whatsoever to you for the deletion of personal data in accordance with our data retention policy.

## SHARING YOUR PERSONAL INFORMATION WITH THIRD PARTIES

We require third parties to respect the security of your data, keep it confidential, and to treat it in accordance with the law.

We may share your personal data with the following third parties in order to perform a contract with you, comply with a legal obligation or in our legitimate interests of conducting our business:

- Third parties who provide services to us, including our ticketing provider (currently TicketCo), our Wi-Fi provider (currently Korubu), our IT providers and marketing and advertising providers (currently MailChimp). These third party service providers are only permitted to process personal data for specified purposes and, where they are processing data on our behalf, in accordance with our instructions.
- Within the Junkyard Golf Club Group, including for the purposes of our regular reporting activities on company performance, operating our business, for system maintenance support and hosting of data or in the context of a business reorganisation or group restructuring exercise.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any agreements, or to protect the rights, property or safety of our business, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, with HM Revenue & Customs, the police, regulators and other authorities and public bodies where we are required to do so by law.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accountancy services.

We require all our data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions as set out in our data sharing agreements.

In some instances where we share data with third parties, such as HMRC, those third parties will also be controllers of your data. We shall not be responsible or liable for the way in which other data controllers hold or process your personal data. Please contact those third parties for further information regarding how they will use your data. We shall only share your personal data with third parties in accordance with this Privacy Policy.

If you use the photo booth at one of our venues, you will need to provide some contact information so that the operator of our photo booth (currently LOOKLOOK) (**the PB operator**) can send you your photo or gif. Your contact and identity information will only be shared with us by the PB operator if you choose to subscribe to our marketing emails. Please note that the photo or gif you take in the photo booth will be published in a public gallery for a limited period (currently 30 days) and after that we will have access to your photo or gif for up to one year via a private gallery. Please do not use the photo booth if you are not happy with this. We may share a link to the public gallery with other individuals who have asked to view their photos or gifs. Those individuals are able to download and share the photos and gifs on social media. We, the Junkyard Golf Club Group, will not share your photo on our social media accounts without your permission. If you would like us to delete your photo or gif from the public gallery, please email us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk). The PB operator will also be a controller of your personal data for the purpose of offering you the photo booth service. Please refer to their privacy policy available [here](#).



## COOKIES

We use Google Analytics, Google Adwords and Hot Jar to help analyse the use of, and attract customers to, our site and to help improve and inform the content on our site and product offerings. These analytics and advertising tools use "Cookies" which are small data files placed on your computer (or other device) to observe customer retention, user journey and to target customers through keyword searches on Google. Overall, cookies help us to provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. You can find out more about the way cookies work and Google Analytics on [www.cookiecentral.com](http://www.cookiecentral.com) and or [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.google.com/analytics](http://www.google.com/analytics).

For more information about the cookies we use and the reasons why we use them, please see our [Cookies Policy](#).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies (and the above websites tell you how to do this). If you disable or refuse cookies, please note that some parts of our site may become inaccessible or not function properly.

## INTERNATIONAL TRANSFERS

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

Whenever we transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to your personal data by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- In some instances, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EEA and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

## LINKS TO THIRD PARTY WEBSITES

From time to time we may direct you to third party websites through our site or Wi-Fi network. We do not control the content of these third party websites. We encourage you to read the privacy policies for these third party websites before submitting personal information to them. Where these third parties are collecting data on our behalf, your personal data will be transferred to us and used in accordance with this Privacy Policy. Alternatively, if the third party has not been authorised to collect information on our behalf, your personal data will be controlled by that third party subject to their privacy policy.

## YOUR RIGHTS

You have the following rights in respect of the personal data that we process about you (where we determine the purpose and means for which that personal data shall be processed):

- The right to request **access** to your personal data that we hold and to receive certain information relating to that data;
- The right to ask us to **rectify** inaccurate data or to complete incomplete data;
- A right to receive or ask for your personal data to be **transferred** to a third party (note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you);
- The right to request the **erasure** of personal data where there is no good reason for us continuing to process it (note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request);
- The right to **object** to how we process your personal data where we believe we have a legitimate interest in processing it (as explained above) (note that in some cases we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms);



- The right to **restrict** processing of your personal data in certain scenarios, for example if you want us to establish the accuracy of the data or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it (note that when processing is restricted, we are allowed to retain sufficient information about you to ensure that the restriction is respected in future); and
- Where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to **withdraw your consent** for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If you withdraw your consent, we may not be able to provide certain services to you.

If you wish to make a subject access request please email us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk) or write to us at Marketing Department, Junkyard Golf Club HQ, 4 Jordan Street, Manchester, M15 4PY.

If you wish to exercise any of the other rights set out above, please contact us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk).

We may ask you to verify your identity if you make a request to us to exercise any of the rights set out above. We may also contact you to ask you for further information in relation to your request to speed up our response. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. You also have the right to request a copy of the information we hold about you.

## HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You may contact us at [customerservice@junkyardgolfclub.co.uk](mailto:customerservice@junkyardgolfclub.co.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us in the first instance and we shall endeavour to resolve your complaint.

## CHANGES TO YOUR DATA

Please let us know if you change your contact details. You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us if you want to do this.

