### **OUR BEER BIKE PRIVACY POLICY**

### 1. Introduction

This Privacy Policy explains how Manchester Beer Bike Ltd ("BEER BIKE", "we", "us", or "our") collects, uses, and discloses your personal data when you use our website <a href="https://manchesterbeerbike.co.uk/">https://manchesterbeerbike.co.uk/</a> (the "Platform") as a customer or guest on our beer bike tours. This policy outlines how we handle your information to ensure your privacy and security while enjoying our services.

#### 2. Data Controller

For the purposes of the GDPR, Manchester Beer Bike Ltd is the data controller for the personal data collected through the Platform. Our company number is **16186494** and our registered address is **128 City Road**, **London**, **United Kingdom**, **EC1V 2NX**.

If you have any questions about this Privacy Policy or your rights, please contact our Data Protection Officer:

- · By email: manchesterbeerbike@gmail.com
- By post: Manchester Beer Bike Ltd, 128 City Road, London,
   United Kingdom, EC1V 2NX, United Kingdom.

### 3. What Personal Data Do We Collect?

We collect the following types of personal data from guests using our Platform:

• **Personal Information:** This includes your first name, last name, address, email address, and phone number.

- Automatically Collected Information: We automatically collect certain information when you interact with our Platform, such as your IP address, usage date, and other usage data.
- Additional Information: We may request additional information from you if required by law or for the specific purpose of providing our services.

### 4. How Do We Use Your Personal Data?

We use the personal data we collect for the following purposes:

- To Provide and Manage Our Services: We use your information to facilitate bookings for our beer bike tours, manage your account, and provide customer support.
- To Process Payments: We use your payment details to process transactions and handle any billing issues.
- To Communicate with You: We may use your contact information to send you booking confirmations, updates about your ride, promotional offers, and other relevant information related to our services.
- To Improve Our Services: We may use your feedback and usage data to enhance our beer bike tours and the overall guest experience.
- To Personalise Your Experience: We use your data to tailor our services and communications to better meet your preferences and needs.
- To Conduct Marketing and Promotions: With your consent, we may
  use your email address and phone number to send you promotional
  materials about upcoming events, special offers, and other
  information related to our services.

- To Monitor and analyse Trends: We use usage data to analyse trends and patterns to improve our Platform and services.
- For Legal Compliance: We may use your information to comply with legal obligations and requirements, including safety regulations and business operations.

Limited Use for New Purposes: 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 that is compatible with the original purpose. For example, we may use your contact information to send you service updates related to the Platform, even though this wasn't the initial purpose of collecting that data. If you wish to understand how the processing for a new purpose is compatible with the original purpose, please contact us using the details provided in Section 13.

**Exceptions for Legal Requirements:** In rare situations, we may need to use your personal data for an unrelated purpose **without your knowledge or consent**, but only where this is required or permitted by law. This could include situations where we need to disclose data to comply with a court order or to prevent imminent harm.

**Transparency is Key:** We are committed to transparency in how we use your data. If we need to use your personal data for a purpose that is not compatible with the original purpose, or in a situation where we rely on an exception to legal requirements, we will notify you and explain the legal basis that allows us to do so.

# 5. Legal Basis For Processing Your Data

We process your personal data based on the following legal grounds:

- Contract: When you use the Platform, you enter into a contract with us, and we need to process your data to fulfil our obligations under that contract.
- Legitimate interests: We may process your data for our legitimate interests, such as improving the Platform, preventing fraud, and ensuring the safety and security of the Platform.
- Consent: In some cases, we may ask for your consent to process your data for a specific purpose, such as sending you marketing communications.
- Legal: We may also process your data where the processing is necessary to comply with a relevant legal obligation or regulatory obligation that we have (e.g., fraud prevention).

## 6. Sharing Your Personal Data

We will only share your personal data with third parties in the following circumstances, all within the confines of applicable UK data protection laws and regulations:

• With service providers and business partners: We may share your personal data with third-party service providers and business partners who assist us in delivering our services and operating the Platform. These third-party services may encompass server hosting, database management, email marketing, communication tools, and data security services. We ensure that all third-party service providers are bound by strict contractual obligations to protect

your personal data and comply with applicable data protection laws.

- · For legal or regulatory reasons: We may disclose your personal data if required by law or regulation, such as responding to a court order or subpoena, or for legal or regulatory reporting purposes.
- With your consent: We may also share your personal data with third parties with your express consent.
- Business transactions: We may share your personal data as part of a merger, acquisition, or other business transaction. In such cases, we will take reasonable steps to ensure that your personal data is treated lawfully and in accordance with this Privacy Policy.

We will never sell, rent, or trade your personal data to third parties for their marketing purposes without your consent.

## 7. Data Security

We take reasonable steps to protect your personal data from unauthorised access, disclosure, alteration, or destruction. However, no internet transmission is completely secure, and we cannot guarantee the security of your data.

#### 8. Data Retention

We will retain your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy, in accordance with UK data protection laws and regulations. This includes:

- Providing the Platform services to you: We will retain your data for as long as you use the Platform.
- Complying with legal obligations: We may also retain your data for longer periods if required by law, such as for tax, accounting, or legal reporting purposes.
- Resolving disputes: We may retain your data for a reasonable period to resolve any disputes or enquiries.
- Enforcing our agreements: We may retain your data for a reasonable period to enforce our terms of use and other agreements.

**Data Minimisation:** We follow the principle of data minimisation and only retain the personal data that is necessary for the purposes outlined above.

**Usage Data Retention:** We typically retain "Usage Data" (such as anonymised data about your activity on the Platform) for shorter durations. However, we may retain this data for longer periods if it is necessary for:

- Security: Maintaining the security of the Platform and preventing fraud.
- **Service improvement:** Improving the functionality and performance of the Platform.
- Compliance with legal obligations: Complying with legal requirements that mandate longer data retention periods.

This approach ensures that we can effectively analyse data to enhance the overall user experience and maintain the security and integrity of the

Platform. We will delete your personal data when it is no longer reasonably necessary for the purposes outlined above, unless we are required by law to retain it for a longer period.

# 9. Your rights

Under UK data protection laws, you have a number of rights in relation to your personal data. These rights are:

- **Right to be informed:** You have the right to be informed about how we collect, use, and share your personal data. This Privacy Policy is intended to provide you with this information.
- Right of access: You have the right to access the personal data we hold about you. You can request a copy of your personal data by contacting us using the details provided in Section 13.
- **Right to rectification:** You have the right to request that we rectify any inaccurate or incomplete personal data we hold about you.
- Right to erasure (Right to be forgotten): You have the right to request that we erase your personal data, subject to certain exceptions. Please note that we may need to retain certain information when we have a legal obligation or lawful basis to do so, such as for tax or legal reporting purposes.
- Right to restrict processing: You have the right to request that we restrict the processing of your personal data. This means that we can only store your data, but not use it further, unless we have your consent or for certain legal reasons.

- Right to data portability: You have the right to request that we transfer your personal data to another controller, where technically feasible.
- Right to object to processing: You have the right to object to the processing of your personal data, in certain circumstances. For example, you can object to receiving marketing communications from us.
- Right to withdraw consent to processing: Where we rely on your consent to process your personal data, you have the right to withdraw your consent at any time.

**Exercising Your Rights:** To exercise any of these rights, please contact us using the details provided in Section 13. We will respond to your request within one month, unless your request is particularly complex.

**Data Minimisation:** We respect your privacy and are committed to data minimisation. We will only collect and retain the personal data that is necessary for the purposes outlined in this Privacy Policy.

Transparency and Communication: We are committed to transparency in how we handle your personal data. We will provide you with clear information about your rights and how to exercise them. We will also keep you informed about any changes to this Privacy Policy.

Your choices are important to us. We will always respect your decisions regarding the management of your personal information.

**Please note:** There may be circumstances where we are unable to comply with your request, due to legal obligations or for reasons of security. If we are unable to comply with your request, we will explain why.

There are no fees associated with exercising your rights under UK data protection law.

### 9. International Data Transfers

BEER BIKE may transfer your personal data to third-party service providers located in countries outside the United Kingdom. These countries may have different data protection laws than the UK.

We will only transfer your personal data to countries that offer an adequate level of data protection. We achieve this through one or more of the following methods:

- Transferring data to countries approved by the UK Information
   Commissioner's Office (ICO) as having adequate data protection
   laws.
- Using Standard Contractual Clauses (SCCs) approved by the European Commission, which create legally binding obligations for the recipient to protect your personal data.
- · Obtaining your explicit consent to the transfer of your personal data.

We take steps to ensure that any third-party service providers we use outside of the UK provide adequate safeguards for your personal data. These safeguards may include contractual obligations, security measures, and data minimisation practices.

## 10. Children's Privacy

Our Platform is not directed to children under the age of 16. We do not knowingly collect personal data from children under 16. If you are a parent or guardian and you believe your child has provided us with personal data, please contact us using the details provided in Section 13. We will take steps to remove the data from our systems.

## 11. Third-Party Links

The Platform may contain links to websites or resources operated by third parties ("Third-Party Links"). These links are provided solely for your convenience and information, and we do not control the content, products, or services offered on these Third-Party Links.

BEER BIKE does not endorse or sponsor any Third-Party Links. We recommend you carefully review the privacy policies and terms of use of any Third-Party Link you visit, as they may differ from our own.

We are not responsible for the content, accuracy, or reliability of any information, data, opinions, advice, or statements presented on Third-Party Links. You access and use Third-Party Links at your own risk.

**Security:** We advise exercising caution and due diligence when accessing Third-Party Links. We cannot guarantee the security of any information you provide to a Third-Party Link.

# 12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the Platform.

## 13. Contact us

If you have any questions about this Privacy Policy or your rights, please contact us:

- · By email: manchesterbeerbike@gmail.com
- By post: Manchester Beer Bike Ltd, 128 City Road, London, United Kingdom, EC1V 2NX, United Kingdom.

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