

## **BA CLUBS LTD PRIVACY POLICY**

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### **1 Privacy Policy**

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. We will communicate any significant changes to the Privacy Policy to You as appropriate.

This Privacy Policy is applicable to any personal information, which is given by You to Us ("User Information") via the web sites located at [www.baclubs.com](http://www.baclubs.com) ("Site"). This Policy is devised to help you feel more confident about the privacy and security of your personal details. Any 3rd Party website that you may connect to from this Site is not covered by this Privacy Policy. We therefore recommend that You additionally review the Privacy Policies of any 3rd Party website that you may connect to from this Site.

### **2 Who are we?**

We are BA Clubs Limited of The Orchard, Hatton Road, Bedfont TW14 9QT. We are a registered company (Reg. no. 06003398) and our registered office is at 15 Dukes Ride, Crowthorne, Berkshire, England, RG45 6LZ

We are the Data Controller of this website. We have appointed Alison Hartigan, the General Manager of BA Clubs Limited, as the Data Protection Officer of BA Clubs Limited. The Data Protection Officer can be contacted at [membership@ba.com](mailto:membership@ba.com) or by post at: BA Clubs Limited, The Orchard, Hatton Road, Bedfont TW14 9QT

### **3 How do we collect information from you?**

We obtain information about you when you use our website, for example, when you contact us about products and services or if you register to receive one of our newsletters. We also collect and store information about you that you supply to us as part of your membership of one of our clubs.

### **4 What type of information is collected from you?**

The personal information we collect might include your name, address, email address, date of birth, staff number, IP address, and information regarding what pages are accessed and when. If you make an online purchase from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

### **5 How is your information used?**

We use your personal data for the following purposes in line with our legitimate interests to administer the site and to interact with you when you request products and services. We may use your information to:

- process orders that you have submitted

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- to carry out our obligations arising from any contracts entered into by you and us, including your membership
- dealing with entries into a competition
- seek your views or comments on the services we provide
- notify you of changes to our services
- send you communications which you have requested and that may be of interest to you. These may include information about products, services, campaigns, promotions of any of any associated companies' goods and services
- process a grant or job application

The lawful basis we rely on to process personal data for the above purposes is variously article 6(1)(a,b,f) of the UK GDPR.

We may also use your personal data:

- (a) To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented (where appropriate) to be contacted for such purposes.
- (b) To carry out our obligations arising from any contracts entered into between you and us. Please note that if you refuse to provide us with your personal data for this purpose, we might not be able to fulfil our contracts with you.

We review our retention periods for personal information on a regular basis.

We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. We may store details of lapsed memberships for the purposes of re-recruiting.

### **6 Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

### **7 Third Party Service Providers working on our behalf:**

We may pass your information to our third-party service providers, agents' subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings).

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

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### 8 Third Party Product Providers we work in association with:

We may at some time in the future work closely with various third-party product providers to bring you additional ranges of quality and reliable products and services designed to meet the needs of our Members. When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share your information with us, which we will use in accordance with this Privacy Policy.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### 9 Your Choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us by email: [membership@ba.com](mailto:membership@ba.com) or telephone on +44 (0) 203 691 3215

### 10 How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [membership@ba.com](mailto:membership@ba.com) or telephone on +44 (0) 203 691 3215 or write to us at: BA Clubs Limited, The Orchard, Hatton Road, Bedfont TW14 9QT.

You have the right to ask for a copy of the information BA Clubs Limited hold about you.

### 11 Your Rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact [membership@ba.com](mailto:membership@ba.com):

**Right to object:** You can object to our processing of your personal data. Please contact us as noted above, providing details of your objection

**Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making. We reserve the right to charge you a fee, or to refuse to respond to it, if your request is manifestly

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unfounded or excessive. We may also charge you a reasonable administration fee if you request further copies

**Right to withdraw consent:** If you have given us your consent to use your personal data – for example, to send you marketing e-mails – you can withdraw your consent at any time, including by clicking the "unsubscribe" link in any marketing e-mail which you receive or by contacting us as at the e-mail address noted above. Please note that where you withdraw your consent, this will not affect the lawfulness of the processing we conducted pursuant to that consent prior to its withdrawal

**Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you

**Erasure:** You can ask us to delete your personal data in certain circumstances, for example where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it

**Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred

**Restriction:** You can ask us to restrict the personal data we use about you in certain circumstances, for example, where you have asked for it to be erased or where you have objected to our use of it

**Automated decision-making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to solely automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any solely automated decision-making

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request. If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your personal data is protected and kept secure.

### 12 Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### 13 Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional

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information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

We shall conduct our profiling of your preference in line with our legitimate interests in improving our service and business to you. We shall conduct credit and fraud profiling of you under our legitimate interests to protect our business and, where appropriate, in order to prevent unlawful acts or to fulfil our regulatory obligations.

### 14 Cookies

Our website uses cookies.

### 15 What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

You can find more information about cookies at:

[www.allaboutcookies.org](http://www.allaboutcookies.org)

[www.youronlinechoices.eu](http://www.youronlinechoices.eu)

For a video about cookies visit [a look at cookies](#)

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests. The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide:

#### Category 1: strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, services you may ask for, like shopping baskets or e-billing, cannot be provided. By using our website, you agree that we can place these types of cookies on your device.

#### Category 2: performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works. By using our website, you agree that we can place these types of cookies on your device.

#### Category 3: functionality cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot

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track your browsing activity on other websites. By using our website, you agree that we can place these types of cookies on your device.

### **Category 4: targeting cookies or advertising cookies**

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisations. By using our website, you agree that we can place these types of cookies on your device.

You can use your browser settings to deactivate cookies. Where you do this, you are still deemed to consent to this Privacy Policy. Please note that the deactivation of cookies might affect the performance of this website.

## **16 Advertising**

We may use third-party advertising companies to serve ads when you visit our website. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you.

## **17 Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

## **18 16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## **19 Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

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### **20 Website recording**

Our web site may also use a web site recording service that may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. The information collected does not include bank details or any sensitive personal data. Data collected in this way is for internal use only. Any information collected by us in this way would be used to improve our website usability and may be stored and used for aggregated and statistical reporting.

### **21 Contact**

Any queries or comments about this policy, or complaints, should be forwarded to [membership@ba.com](mailto:membership@ba.com) or by post to:

BA Clubs Limited,  
The Orchard,  
Hatton Road,  
Bedfont  
TW14 9QT

### **22 Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in March 2023.

### **23 Right to Complain**

If You have any complaints in relation to this Policy, you have a right to raise these with the UK Information Commissioner's Office. This can be done via their website (<https://ico.org.uk/>), or via their helpline on 0303 123 1113.