



PRIVACY POLICY FOR THE SPA GROUP

These Terms & Conditions explain our responsibilities to you, along with your responsibilities to **SPA** and to the other users of the service.

If there is anything you do not understand or have any further questions about this product, please contact our Support Line or email us at support@SPAGroup.co.uk

SPA reserves the right to refuse any application for service.

"SPA" means **THE SPA GROUP (and all divisions of)**, Technopole, Hampshire PO2 8FA United Kingdom and/or any other group member of SPA . which shall supply Services to You..

"You" means the person, firm or company who purchases Services from **SPA** and any of their or its employees, consultants and authorised agents.



www.SPAGroup.co.uk

INTRODUCTION

THE S.P.A GROUP (**SPA**) is a Data Controller under the Data Protection Act 1998. This means that we are responsible for how and why your personal information is used.

We are committed to respecting your privacy and to complying with the Data Protection Act and any other relevant privacy laws. We have provided this Privacy Policy to help you understand how we collect, use and protect your personal information..

COLLECTION AND USE OF PERSONAL INFORMATION

When you register with **SPA**, we may collect personal details about you. Personal information such as your name, address, email address, preferred username and password with possible credit card details on the registration forms.

SPA does not share information with other companies other than its own associates, and does not sell its user information. Any personal information we collect may be used for such purposes as processing transactions, customer service, marketing, product and service development, recruiting and facilitating subsequent use of this Web site. We explicitly reserve the right to disclose any such personal information if required to do so by law, or in the good faith belief that such action is reasonably necessary to comply with legal process, respond to claims, or protect the rights, property or safety of our company, employees, customers, or the public.

When you visit any of the **SPA** sites, we also collect web site usage information and information about your computer and internet connection, including your computer's IP address, the type and version of browser and operating system you use, your internet domain and, if you arrived at **SPA** via a link from another website, the URL of the linking page.

We may use this information to:

- * fulfil orders
- * personalise the content you will see based on your personal characteristics or preferences
- * notify you of relevant new products and features on **SPA** (if you opt in to receiving such information)
- * notify you of promotions from **SPA** (if you opt in to receiving such information)
- * ensure, as far as is practical, that our site is compatible with the browsers and operating systems used by the majority of our visitors.

We also use the information for in-house research to:

- * improve our understanding of customer needs in developing **SPA**
- * build marketing profiles
- * aid strategic development
- * manage our relationship with our resellers and affiliates.

The results of all such research and analysis will be presented as anonymous or aggregated information and will not reveal any personal facts about individual customers.

SPA has taken steps to ensure that high standards of data protection are adhered to in its offices for all the forms of processing mentioned above.



COOKIES

A cookie is a small file which is placed on the user's hard drive during a **SPA** website visit only in the shopping cart system when purchasing goods. This file allows the user to move quickly and easily around our site. It is used to identify returning users and to identify subscribers when they return to the shopping cart to purchase an item and is deleted after 30 days.

You can delete cookies from your hard drive at any time. Bear in mind, though, that if you delete these cookies, any settings such as your stored username and password will have to be reset when you log in again.

Unlike many sites, you will be able to use **SPA** websites even if you set your browser not to accept any cookies. However, certain features and content may not be available to you and you will have to log in every time you visit.

Further information on the use of cookies can be found at:

www.cookiecentral.com

SECURITY POLICY

SPA has appropriate measures in place to ensure that users' personal details are not misused, accidentally destroyed, lost or altered within the **SPA** server environment.

Occasions will arise when customer information is passed outside **SPA** to other data processors (e.g. fulfillment companies, database consultants etc.) but they will only act upon instruction from **SPA** in order to perform the services required.

TRANSFER OF PERSONAL DATA OVERSEAS

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing **SPA** and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

RETENTION AND DELETION POLICY

When you provide us with your personal information we will only retain it for as long as we need to, to make sure that we have dealt with all aspects of your enquiry or complaint. In practice, this means that we will only keep your name and address for no more than 30 days if you make an enquiry and request a brochure.

If we are dealing with you as an ongoing customer we will keep your personal information for 12 months after you are no longer a customer. All personal information held by **SPA** will be deleted in a structured, secure and timely manner.

DISCLOSURE OF YOUR PERSONAL INFORMATION

In order to process your orders we may need to disclose the personal information you send us to your telecoms provider. We may then need to disclose it to a third party such as an independent engineer, to help us fulfil the order.

To help us process our work we have contracts with companies who provide us with services such as IT support and document scanning. Where they process your data for us our contract with them makes clear that they must hold it securely and only use it as we instruct them to.

If your case raises issues which we think might be more appropriate for one of the regulators, we will only pass your information on with your consent.



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CHANGES TO THIS POLICY

If we decide to change any of the information contained in our privacy policy we will post details of those changes on our homepage. This will help ensure that you are always aware of what information we collect, how we use it, and under what circumstances, if any, we share it with other parties.

ACCESS TO YOUR INFORMATION

The Data Protection Act 1998 provides you with a right of access to a copy of any personal information we may hold about you. This is called the right of subject access. We charge a fee of £10 for access requests and we are required to provide you with a copy of your personal information within 40 days. If the information we hold is shown to be incorrect we shall make the necessary amendments.

You may write to us at any time at the address below to obtain details of the information we hold on you.

Data Protection Officer
THE SPA GROUP
TECHNOPOLE
Kingston Crescent
HAMPSHIRE PO2 8FA