Who should read this document?

If you provide your Personal Information to Hallidays then you should read this document to understand your privacy rights and how we gather and use your information.

Privacy Policy - Introduction

At Hallidays we really value your right to privacy and the security of any personal information you may supply to us. The General Data Protection Regulation (GDPR) is signed into Law in the UK in May 2018. At Hallidays we want to ensure that you are fully aware and agree to how we collect, store and use any personal information we may collect about you.

Your rights
Your personal information is your own property. We fully respect this and you have certain rights when you entrust us with your details, such as what we can use your information for, what information we hold and also any requests for us to remove, correct or delete any information we hold about you. In addition, you have a right to complain to us and to the data protection regulator.

Permission
The final pages of this document will allow you to accept and approve our collection, storage, use of your personal information for various purposes related to your business. You will have control over what we can use and how, and importantly we can only use your personal information in the manner we have detailed in this document.

Our Commitment
Hallidays respect your right to privacy and fully respect your rights under the GDPR to protect and act responsibly with your data whilst it is within our care. We will never use your personal information for anything you have not opted in to nor pass your personal data onto any third party who is not directly involved with the services we offer and/or supply to you.

Under the GDPR you have the following rights as an individual.

• To be informed on how we will use your data in a clear, transparent, intelligible and easily accessible way

• To access your personal data and supplementary information if you request it

• To have personal data rectified if it is incomplete or inaccurate

• To request the deletion or removal of personal data where there is no compelling reason for its continued use

• To restrict or suppress processing of personal data and to request it is no longer used

• To obtain and reuse your personal data across different services

• To object if your data is not being used for legitimate purposes, or direct marketing you haven't agreed to

Further reading on the above points can be found by visiting the ICO website https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/
The details

1. How we gather your personal information.
   We may collect information directly from you, when you register for services at Hallidays, use our website, mobile app or at one of our live events. Only the minimum amount of personal information required will be requested by us to be able to effectively provide you with the best possible service. The types of information we request may be specific for each service and for some services the “minimum amount” may be more extensive than for others. In general the information we request will be name, address and contact information however to provide many of the services we offer we will need to collect more information in order to assist you. These can include: bank account details (both personal and/or business), information held at companies house, National Insurance details, pension and savings information and any other personal information required specifically to assist us in relation to providing the services, for which you are engaging us. If using our website then we may collect certain information from you using Cookies. Please refer to our separate Cookie Policy available on our website for further information.

   We also may obtain some personal information from monitoring or recording calls and when we use CCTV. We may record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our team members and customers, and to resolve queries or issues. We may also use CCTV on our premises to ensure the safety and security of our team members and customers.

2. Uses of your Personal Information.
   Some items of personal information are required by law for certain services, and we may further use your information for responding to and fulfilling your requests for our services, or for the various products we may use to assist in providing those services. Including:

   2.1 Operate and administer our products and services
   Completing forms or submissions on your behalf, sending you automated service messages such as emails, reminders, phone calls, surveys and also direct messages through our mobile app.

   2.2 To administer payments to and from you, we will use:
   Your contact details and the payment details that you have provided to us.
   We may give this information to our third party payment providers to process the payment to you.

   2.3 To advise on the suitability of our various products and services or to apply on your behalf:
   We may need to use your personal information to apply for some products and services or to complete applications for products and services on your behalf.

   2.4 To comply with our legal obligations, to prevent financial crime including fraud and money laundering we will use:
   (a) any information you have given us, that we have obtained from a third party, or that we have obtained by looking at how you use our services, where it is necessary for us to use that information to comply with a legal obligation; and (b) this information may include name, address, date of birth, every country of residence/citizenship, personal identification (which may include passport number or driving license number) your IP address, and information about any criminal convictions.

   2.5 For financial management and debt recovery purposes, we will use:
   (a) your contact details;
   (b) information we obtain from looking at how you have used our services, including information about your location; and
   (c) information available within the Hallidays Group about how you have used services provided by other Group Members.

   We may give information to and receive information from third parties where it is necessary to recover debts due by you to us, for example, debt recovery agents, credit reference agencies and sheriff officer or bailiff services. This might include passing personal information about you to a third party who we have transferred your debt to, and who will then contact you directly to collect that debt. If your debt is transferred to a third party you will be advised of the identity of that third party. We use your information in this way because it is necessary to perform our contract with you, to exercise our legal rights, and because it is fair and reasonable for us to do so.
The details…continued

2.5 For business customers, we will use personal information about key individuals in the business, so we can operate and administer the products and services which we provide to the business – to do this we will use:

(a) personal information about key individuals who are either a sole trader of the business or are a proprietor, director, company secretary, shareholder, partner, member, committee member, trustee, controller, beneficial owner or authorised signatory to the account of the business.
(b) the personal information we use about key individuals is set out in section 6, and we may use it for any of the purposes described in section 6. We may hold personal information on key individuals for the purposes of operating and administering products and services which we provide to the business, as well as for the purposes of fraud and money laundering, for debt recovery purposes, and to make credit decisions about the business.

Personal information on key individuals is obtained directly from the key individual, from the business to which the key individual is linked with, from the key individual’s dealings with any member of the Hallidays Group of companies, and from fraud prevention and credit reference agencies. Such information may include special categories of personal information, such as information relating to health.

3. Your Consent.

Sometimes we need your consent to use your personal information (for example for marketing). We won’t always need consent to use personal information – for example if we need it to meet regulatory requirements or to perform a contract with you. Where you have given us consent, you have the right to withdraw it at any time. (See section 7 for more information)

4. We would like to hold other non service specific personal information on record.

Such as contact information, name, address, email addresses and phone numbers, for the purposes of informing you of other complimentary Hallidays services, or to send you advice that we believe will benefit you, or other informational material which we feel could enhance your experience as a Hallidays client. We will never pass your information to 3rd parties without your express permission and having discussed it with you first.

5. You have the right to request to view what information we hold.

At any time you may request a full list of all personal information we hold about you and why we hold it. This is called a Subject Access Request. We have a Subject Access Request procedure in place. Please contact for further details or to make a request: Hallidays Group Limited, Riverside House, Yew Street, Stockport, SK4 2HD. Please make all requests for access in writing.

6. Your data may be transferred and stored outside the EEA.

The majority of Hallidays business and processing systems are UK based however your personal data may be transferred to a third party who may store this data outside the EEA. Under these circumstances your personal data will be covered under the third party’s own Privacy and Data processing policies.

7. Should you request it we will remove some or all of your personal information from our systems.

You have a “right to be forgotten” and this means that should you request it, we will remove as much of your personal information from all of our systems as we can. In some cases, we are required by law to keep specific personal information on our files, however under GDPR, we are obliged to keep this information for no longer than is absolutely necessary so we will always inform you exactly what we still have on our files and how long we need to keep it for; we also have a removal procedure in place, please contact Hallidays Group Limited, Yew Street, Stockport, SK4 2HD. Should you invoke your right to be forgotten, you fully understand that this may affect our ability to provide the same level of service to you if you require it until we have collected your information again.

www.hallidays.co.uk
The details ...continued

8. Our legal basis for using your personal information.
   We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

   (a) we have your consent (if consent is needed);
   (b) we need to use the information to comply with our legal obligations;
   (c) we need to use the information to perform a contract with you; and/or
   (d) it is fair to use the personal information either in our interests or someone else’s interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services.

   Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See “Permissions and Consent Form” (if included) for details about how to withdraw your consent to marketing.

9. How long we keep your personal information for.
   How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for. We keep the other personal information we use for seven years after closure of your account or from the date you last used one of our services. In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, and for the purpose of making remediation payments.
Definitions

What does all this mean?

• “You” - refers to you as a website visitor, a user of our App or a person who has already or who is looking to engage our services.

• “We” and “Our” - refers to Hallidays Group Limited, Hallidays Wealth Management Ltd, Hallidays HR Limited and Hallidays IT Limited.

• Personal Information - refers to any data we may collect about you that could personally identify you.


• Data Controller - for the Hallidays group of companies the Data Controller is “Hallidays Group Limited”.

• Location of your data - When your personal data is stored by Hallidays on our systems then it is stored on our own servers at Riverside House, Kings Reach Business Park, Stockport, SK4 2HD.

• Transfer of your data - We may need to transfer your information outside the UK to other Group companies, service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area, e.g. the USA. We may need to transfer your personal information to territories that are outside the EEA. We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. We also use the EU Commission approved EU-US Privacy Shield when personal information is transferred to the US. Visit www.privacyshield.gov for more information. You can find out more information about standard contractual clauses as detailed by the ICO. Visit their website at https://ico.org.uk and search for ‘International transfers’

• Social - meaning Social Media. This could be any social media that we also use for business purposes, not limited to but including: LinkedIn, Twitter, Instagram, Google +