

## **PRIVACY POLICY**

Please take a moment to read the website's privacy policy set out below. References to "we", "us" and "our" in this policy are references to Winterhill Hospitality Limited. We may however appoint third parties to store and process your information on our behalf.

Protecting your privacy is very important to us. This Privacy Policy explains our data processing practices and your options regarding the ways in which your personal data is used. If you have any requests concerning your personal information or any queries with regard to how we process your information please contact us using the details below.

We reserve the right to change the terms of this policy from time to time and your continued use of the Website will be deemed to be acceptance of amendments we make. This Privacy Policy was last updated on 12th December 2011.

### **1. What information do we collect about you?**

At various times during a visit to this Website you may be asked to provide us with personal information (for example your name and contact details). This may be about activities such as purchasing services or products, subscribing for a service or participating in surveys.

In common with many other online services we may also use "cookies" to collect information about how you use the Website. This information is used to produce statistical reports on website activity and allows us to tailor the Website to suit your interests.

A cookie is a small amount of data sent from the server and stored on your computer's hard drive. Most web browsers are automatically set up to accept cookies, but you can set your browser to refuse cookies or ask your browser to show you where a cookie has been set up. Please note that certain features of this Website are only activated by the presence of a cookie and if you choose to refuse cookies these features may not be available to you.

For further information about cookies visit "[www.allaboutcookies.org](http://www.allaboutcookies.org)"

### **2. How will we use your personal information?**

Primarily we will use the personal information we collect about you to send you information you have requested, create a membership profile for you (allowing us to provide a personalised service when you visit the Website), assist in the provision of products and services to you and to enable us to review and improve the products or services offered to you.

From time to time we would also like to contact you to let you know about products and services offered by us, our clubs, their official partners and other carefully selected third parties that may be of interest to you.

We will **ONLY** disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Winterhill Hospitality Limited or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- 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 or apply our terms of use and other agreements; or to protect the rights, property, or safety of Winterhill Hospitality Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **3. What are my choices?**

You have a right to stop us from contacting you for marketing purposes or giving your information to third parties. If you no longer wish to be contacted for marketing purposes please contact us using the contact details below.

You are also entitled to request a copy of the information that we hold about you. If you would like to do this please contact us using the details below. You may be required to pay a small fee for this service.

We want to make sure that the personal information we hold about you is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

### **4. When does this Privacy Policy not apply?**

This Privacy Policy only applies to the collection of personal information by us and those whom we authorise. It does not cover third party sites to which we provide links, nor does it cover advertisers and content

partners within our service who may also collect your personal information. If you link to third party websites from this Website you should read their privacy policies and terms of use carefully.

If you place personal details on any publicly accessible page (for example on a message board) then this data will not be covered by our Privacy Policy.

## **5. How do we protect your information?**

We are firmly committed to data security. The personal information you provide to us is encrypted before it is sent to us and once it is received we store it on secure servers. We take steps to guard against unauthorised access to your personal information and to ensure it is treated in accordance with our Privacy Policy. Unfortunately, although we make every effort to create a secure environment for your personal information we cannot guarantee the safety of any personal information which you transmit to us online.

The personal information we collect may be transferred to and/or stored or processed at a location outside the European Economic Area. By providing your personal information you consent to this transfer, storage and/or processing. We will take steps to ensure that your personal information is kept securely and in accordance with the Privacy Policy.

## **6. Contacting us**

Please contact us using the details below if you have any questions about our Privacy Policy or the information we hold about you:

Email: [info@winterhill-hospitality.com](mailto:info@winterhill-hospitality.com)

Address:

Winterhill Hospitality Limited, Unit 1504 & 1506, 15<sup>th</sup> Floor, Leighton Centre, 77 Leighton Road, Causeway Bay, Hong Kong.

## **COOKIES**

### **EU Cookie directive**

From 26 May 2011 a new European Union directive requires us to gain the consent of our users to download cookies on to their machines. There are various methods we could use to gain users consent. For example, we could use pop-ups; prompting users to tick a box to confirm they give permission for us to download cookies on their machine.

Alternatively, we could use an online form that all users must complete before using the website.

We consider both of these solutions as obtrusive. We want our users find information and services quickly.

Therefore, we have taken the decision to promote how we use cookies on our website instead. This will enable users to make an informed decision whether they want to disable this feature.

There are links on our terms and conditions and disclaimer pages which are in the footer of every web page pointing to this information.

### **What is a Cookie**

Information may be sent to your computer in the form of an Internet "cookie" to allow our servers to monitor your requirements. The cookie is stored on your computer. Our server may request that your computer return a cookie to it.

These return cookies do not contain any information supplied by you or any personally identifiable information about you.

Such measures are necessary to allow Winterhill Hospitality to measure the usability of the systems, which will help to continually improve user experience of our websites. Your browser software should however enable you to block cookies if you wish to. For more information about cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **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 have asked for, like shopping baskets or e-billing, cannot be provided.

### **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.

### **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 track your browsing activity on other websites.

### **Targeting 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 organisation.

### **How to disable cookies**

You can stop cookies being downloaded on to your computer by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

### **Consent**

By using our website you consent to collection and use of any information you provide to us by Winterhill Hospitality Limited for the purposes described above. If we amend our privacy policy, any changes will be published on this web site. If at any time you wish to update the information which we hold about you, or if you wish to stop receiving information from Winterhill Hospitality Limited, please contact us.