

Y GANOLFAN RHEOLAETH ANGOR THE MANAGEMENT CENTRE

Privacy Notice

1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

For example, we will explain things such as our credit checking procedure and how we combine data across The Management Centre and its parent company Bangor University to combine information so that we have detailed information on your preferences.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we will need to update this Privacy Notice from time to time. We will notify you of any significant changes, but you are welcome to come back and check it whenever you wish.

2. What is The Management Centre?

The Management Centre is a Residential Training and Conference Centre situated in the heart of Bangor University. We are a wholly owned subsidiary and trade as a limited company, but where possible, adhere to the policies and procedures of Bangor University.

- Bedrooms: Our 56 bedrooms are graded as 4 star by Visit Wales and we have achieved the Visit Wales ٠ Business Class Gold Standard for our meeting and conference rooms.
- Conferences and Events: The Management Centre is licensed for civil ceremony weddings and can cater for wedding receptions, gala dinners and a myriad of other events in our licensed 1884 Restaurant, Bar and Hugh Owen Hall.
- Chartered Banker MBA: Bangor Business School is the only institution in the world to offer the Chartered Banker MBA (CBMBA), a ground-breaking qualification that allows you to gain the dual award of a top MBA in Banking and Finance and the coveted 'Chartered Banker' status; the highest professional award available to bankers worldwide.
- Training: The Management Centre works closely with our training partners Grŵp Llandrillo Menai and Bangor University to offer a wide range of industry-recognised and professional qualifications.

For simplicity throughout this notice, 'we' and 'us' means The Management Centre and its departments.

3. Explaining the legal bases we rely on

Data protection legislation (in this instance both UK law and also the General Data Protection Regulation "GDPR") sets out a number of different reasons for which a company may collect and process your personal data, including:

- **Consent:** In specific situations, we will need to collect your consent in order to process your data and we do this, for example, by inviting you to tick a box to receive email newsletters. When collecting your personal data, we will always make clear to you which data is necessary for us to hold in order to carry out a particular service.
- **Contractual obligations:** In certain circumstances, we need your personal data to comply with our contractual obligations, and we will make this clear to you.
- Legal compliance: If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting The Management Centre to law enforcement.
- Legitimate interest: In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, passing information to finance for billing.

4. Information we collect

Where you visit The Management Centre or use our website, we will collect and process the following personal data about you:

- Information you give us: This is information that you give us when e.g. completing a web form, booking a bedroom, event or training course, or by corresponding with us e.g. reporting a problem.
 The information you give us may include your name, title, age, gender, address, email address, phone number, records of communications sent to you by The Management Centre, or communications received from you, any of your social media usernames if you interact with us through those channels, and financial details. We also hold information regarding any specific assistance you have advised us you may need in the event of an emergency.
- Information we collect about you: Every time you use our website we collect certain information about you, including your IP address, location, browser type, and referral source, length of visit, number of page views, full Uniform Resource Locators (URL) and your navigation around our website. This information is collected by the cookies we use. See section 9 below for information on cookies.
 When on our premises, which have CCTV systems operating for the security of both customers and staff members, please be aware that these systems may record your image during your visit.
- Information we receive from other sources: This is information we receive about you if you use any of the other services we provide, for example attending a networking event held in conjunction with one of our business partners. In this case you will have been informed when the data was collected that it would be shared internally and would be combined with any data that we already hold about you collected through the website. We will also have told you for what purpose we will share and combine your data.

The Management Centre will not capture or store your personal data in person or via our website without your knowledge and consent.

Information collected on this Website is owned by The Management Centre. We will not sell, share or rent this information to others in ways different from what is stated in this Policy.

The Management Centre website may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies and the way in which they manage their data. Please check these policies before you submit any personal data to these third party websites.

5. How we use the personal data we collect

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

As long as we have informed you of this, and have your consent, data protection legislation allows us to do this in order to better understand our customers and provide the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

We use personal data held about you in the following ways:

- The personal data provided by you on our online web forms, or when you contact us by phone or in person, will be used for the purposes of processing your enquiry. By submitting your enquiry you are consenting to your data being processed by The Management Centre in line with your enquiry, for example your personal data will be shared with our partners if you make an enquiry regarding training.
- We use the anonymised analytical data we gather to analyse trends, administer the Website, track user movements and gather broad demographic information for aggregate use.
- Provided you have consented at the point of us collecting your personal data/submitting the enquiry web form, we may use your personal data to communicate relevant marketing information about The Management Centre and our goods and services by mail, email, SMS, telephone, or targeted advertising on social media and other online platforms such as on Google. This may include information on:
 - o information about a course you may be interested in applying for
 - $\circ \quad \text{information about a course you have applied for} \\$
 - o promotion of The Management Centre's services
 - o notification of events such as Networking events held in conjunction with our business partners
 - $\circ \quad \text{promotion of discounts and seasonal special offers}$
- If you no longer wish to receive marketing information, please email our <u>Marketing Officer</u>. You will also be given the opportunity to opt out of receiving marketing information on each piece of marketing information we send to you.
- The technical information we collect using cookies will be used for the purposes set out in Section 9 of this policy.

- The information we receive from other sources may be combined with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and you can opt out at any time.
- The Management Centre shall not sell or otherwise transfer your personal data to any third parties except as set out in this privacy policy which may include the following circumstances:
 - 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 The Management Centre, our staff, or others. This includes exchanging information with third parties for the purposes of fraud protection and credit risk reduction.

6. How we store your personal data and how long do we keep it for?

Once we have received your information, we will use appropriate organisational and security measures to prevent unauthorised access to your personal data.

Your personal data is stored by The Management Centre in accordance with Bangor University's Record Retention Schedule and the Immigration (Hotel Records) Order 1972.

7. What are your rights regarding your personal data?

The Management Centre aims to keep your personal data up to date and welcomes any updates to your details or corrections to any inaccuracies you choose to provide. Please help us keep our records updated by informing us of any changes to your email address and other contact details.

You have the right to request:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for a copy of your information: please write to Facilities & HR Manager, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG

To ask for your information to be amended: please email our Marketing Officer

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails.
- Write to: Marketing Officer, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG
- Email: Marketing Officer

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Automated Decision Making

No automated decision making processes are utilised with The Management Centre or any of its departments.

8. Transferring information outside the European Union

The data that we collect from you may be transferred to, and stored at, a destination outside the European Union (EU). It may also be processed by staff or by partners operating outside the EU who work for us or for one of our suppliers, agents, or partners. By submitting your personal data, you agree to this transfer, storing or processing.

Please note that countries outside the European Union do not always have the same data protection obligations as we do. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this privacy policy.

9. Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. By using our website(s) you are agreeing that we can place cookies on your device. Currently our cookies include your language preferences and information on the pages within our website which you visit. However, all usage data is aggregated and does not show the activities of any given individual or computer. We only use cookies to enable us to provide the best online service for you. Our analytics data includes information about your computer and includes your IP address, browser type, domain name, access times and referring website addresses. This information is used by The Management Centre for the operation of the service, to maintain quality of service and to provide general statistics regarding use of The Management Centre website.

10. Passwords

Where you have been provided with (or where you have chosen) a password which allows you to access certain parts of the website, you are responsible for keeping the password safe and confidential. You must not share a password with anyone.

11. The complaints process

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you should contact us in the first instance: please write to Facilities & HR Manager, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG

You also have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)