



Fox's Holdings Ltd Privacy Notice

WHO WE ARE

Fox's Holdings Ltd 'we' gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data. By visiting www.foxsmarina.com (the "Website") you are accepting and consenting to the practices described in this policy.

Fox's Holdings Ltd registered office is at Fox's Marina, Ipswich, Suffolk, IP2 8SA, UK and we are a company registered in England and Wales under company number 05689981. We are registered on the Information Commissioner's Office Register; registration number Z756002X, and act as the data controller when processing your data. Our designated Data Protection Officer/Appointed Person is Mark Underwood, who can be contacted at Fox's Holdings Ltd. Ipswich, Suffolk, IP2 8SA, UK.

INFORMATION THAT WE COLLECT

Fox's Holdings Ltd and its subsidiaries, Fox's Marina & Boatyard, Fox's Chandlery and Fox's Yacht Service, processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The Personal Data that we may collect is:

- Personal data you provide to us by filling in forms, or otherwise contacting us via, the website;
- Personal data you provide to us when you attend any of our events;
- Personal data you provide if you subscribe or request any of our services or if you enter into a competition or promotion run by us;
- Personal data you provide to us when corresponding with us by phone, email or otherwise; and
- Personal data you provide when applying for a job advertised or submitting a speculative job application and/or C.V.

We collect information in the ways below:

- Via our Work Acceptance / Private customer details forms in order to set up a new account.
- Via telephone conversations.
- Via electronic mail.
- Via a contact form on the Fox's Marina website.

When you use the Website or any of our mobile applications, we may also automatically collect the following information which may include personal data:

- Technical information including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time);
- Products you viewed or searched for;
- Page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs); and
- Methods used to browse away from the web page

HOW WE USE YOUR PERSONAL DATA (*Legal Basis for Processing*)

Fox's Holdings Ltd takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address and you can be contacted if required.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

Your credit card number, bank account and other financial information will not be revealed to anyone, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process.

YOUR RIGHTS

You have the right to access any personal information that Fox's Marina Ipswich Ltd processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

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 data is protected and kept secure.

SHARING AND DISCLOSING YOUR PERSONAL INFORMATION

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

SAFEGUARDING MEASURES

Fox's Holdings Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction. Our network configuration includes multiple layers of protection for improved security, at the firewall, password protection, network policies and endpoint security.

CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your personal information to Fox's Holdings Ltd, however, as this information is required for us to provide you with our services/deliver your products/legitimate interests, we will not be able to offer some/all our services without it.

LEGITIMATE INTERESTS

As noted in the '*How We Use Your Personal Data*' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing information such as your name, postal address, email address and relevant yachting specific information such as make of boat owned and have identified that our interests are commercial and legitimate as long as the data used is not intrusive.

HOW LONG WE KEEP YOUR DATA

Fox's Holdings Ltd only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

LOGGING A COMPLAINT

Fox's Holdings Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

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