



Russell Partnership Collection

Privacy Policy

December 2023

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Introduction

The following is the Privacy Policy for the Russell Partnership Collection of commercial entities (**“the Collection”**).

The Collection is a group encompassing five companies who deliver international food consulting, hospitality technology development and services, philanthropic food support and operational delivery of food and beverage for Therme Wellbeing Resorts.

The Collection includes the following company entities (the first four of which have as their registered office address Kings Parade, Lower Coombe Street, Croydon, Surrey, United Kingdom, CR0 1AA) and this Privacy Policy applies to all of them:

- i. **Russell Partnership Collection Limited** with CRN 11435724 (**“RPC Ltd”**)
- ii. **Russell Partnership (UK) Limited** with CRN 06948534, also trading as Russell Partnership Middle East, and Russell Partnership Consulting
- iii. **Russell Partnership Technology Limited** with CRN 11457937
- iv. **Russell Partnership Foundation Limited** with CRN 12561267
- v. **Therme RPC Limited** with CRN 13051620 and registered address Tithe Barn, Church Road, Thame, Oxfordshire, England, OX9 3AJ

The Collection respects your privacy and is committed to protecting your Personal Data.

Important Information and Who We Are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how each of the companies forming part of the Collection collects and processes your Personal Data through your use of this website or in any dealings with any of the companies forming part of the Collection, its employees, officers, or agents. This website and all services provided by the companies forming part of the Collection are not intended for children and the Collection does not knowingly collect data relating to children.

Controller

Each of the companies forming part of the Collection may collect your Personal Data in the role of controller in accordance with this policy and is then responsible for your Personal Data (the Collection and each or any of its entities may also be referred to as “we”, “us” or “our” in this Privacy Policy). We have appointed a Data Protection Office (DPO) who is responsible for overseeing questions in relation to this Privacy Policy across the Collection. If you have any questions about this Privacy Policy, or any requests under data protection law, please contact the DPO on:

Email address: gemma.margeston@russellpartnership.com

Postal address: Kings Parade, Lower Coombe Street, Croydon, Surrey, CR0 1AA

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We keep our Privacy Policy under regular review and may update it from time to time to provide you with the most up to date information on how we collect and process Personal Data.

It is also very important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

The Data We Collect About You

Personal Data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or where the Personal Data has been aggregated to provide generalised statistics (this is data derived from your Personal Data, but it no longer directly nor indirectly reveals your identity). However, if we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title / pronoun, date of birth
- **Contact Data** includes billing address, delivery address, email address and telephone numbers
- **Financial Data** includes bank account and payment card details
- **Technical Data** includes internet protocol (IP) address, your login data for your online learning account, browser type and version, time zone setting and location, browser plugin types and versions, operating system and platform, and other technology on the devices you use to access this website
- **Contract Data** includes your Identity Data, purchases or orders made by you, your interests, preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website, products and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences
- **Health Data** including details about your nutrition, your exercise, lifestyle choices, medical history, medication information, functional test results and appointment minutes or memos

We do not knowingly or deliberately collect any other Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions or trade union membership). Nor do we knowingly or deliberately collect any information about criminal convictions and offences.

If You Fail to Provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How Is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

Direct Interactions

You may give us your Identity, Contact and Financial Data in person either by filling in forms or verbally providing this information or by corresponding with us by post, phone, email or otherwise.

This includes Personal Data you provide when you:

- Contact us in person, by telephone or in written correspondence about our products or services
- Subscribe to our service or publications
- Request marketing to be sent to you
- Enter a competition, promotion or survey
- Give us feedback

Automated Technologies or Interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. Please see our **Cookie Policy** for further details.

Third Parties or Publicly Available Sources

We will receive Personal Data about you from various third parties and public sources, including:

- Technical Data from the following parties:
 - Analytics providers such as Google
 - Lead generating services including Lead Forensics
 - Public information registries such as Companies House and the electoral register
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Thinkific, Absorb LMS, Stripe and PayPal

How We Use Your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. Performance of Contract means processing your data where it is necessary, for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract

- Where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests. “Legitimate interest” means the interest of our business in conducting and managing our business to enable us to give you the best service / product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests

We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

- Where we need to comply with a legal obligation. “Comply with a legal obligation” means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need further information about the processing of your Personal Data.

Purpose / Activity	Type of Data	Lawful Basis for Processing Including Basis of Legitimate Interest
To identify you as a customer, contributor, supplier, or other business contact	(a) Identity (b) Contact	Performance of a contract with you Necessary for our legitimate interest
To deliver services to you: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) legal requirement
To manage our relationship with you: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To store your Personal Data on Microsoft 365 Cloud Based servers managed by third-party service providers	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (for running our business, provision of storage and hosting of IT cloud services)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products / services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Purpose / Activity	Type of Data	Lawful Basis for Processing Including Basis of Legitimate Interest
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Where necessary for the delivery of our services to you, we may transfer your Personal Data to other companies in the Collection	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (the way in which our business is structured and the way the services you have contracted to receive are delivered)
Where necessary for the delivery of our services to you, we may transfer your Personal Data to third parties where it is required for the purposes of a joint venture between the third-party and one or more of the companies forming part of the Collection	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (the way in which our business is structured and the way the services you have contracted to receive are delivered)

Promotional Offers from Us and Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us, and you have not opted out of receiving that marketing.

Third-Party Marketing

We will not share your Personal Data with third parties for marketing purposes unless we have your express opt-in consent to this beforehand.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by clicking on the opt-out (unsubscribe) links included in the marketing messages, or by contacting us at info@russellpartnership.com and requesting to be removed from the marketing lists.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product / service purchase, warranty registration, product / service experience or other transactions.

Change of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Data

We may share your Personal Data between the Collection group entities (Russell Partnership Collection Ltd, The Russell Partnership (UK) Limited, Russell Partnership Technology Limited, Russell Partnership Foundation, and Therme RPC Limited), as well as with selected third parties for the purposes set out in the table above.

When we share Personal Data between the Collection group entities, we do so based on our legitimate interests as a business in providing our services in this way, accessing the different skills in each of the entities. We have balanced our best interest against the rights and interests of the data subjects concerned and have not identified any prejudice to their rights and interests from this processing. We ensure the processing is undertaken in compliance with the law and have in place an intra-group data processing agreement to formally record the arrangement.

We may also share Personal Data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets, or where we work with third parties in a joint venture arrangement. Alternatively, we may seek to acquire other businesses or merge with them. If a change in structure or ownership happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law, and we enter into data processing or data sharing agreements with third parties to ensure the continued safety and security of your Personal Data. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

International transfers

We share your Personal Data within the Collection. This involves processing your Personal Data in the UK, the EEA and may involve transferring your data outside the UK and the EEA.

The Collection has staff members in the Middle East and the United States, and some other external third parties are based outside the UK, so their processing of your Personal Data may involve a transfer of data outside the UK and the EEA, into so-called “third countries”.

Whenever we transfer your Personal Data into a third country (that is any territory outside the UK and EEA), we ensure a similar degree of protection is afforded to it by implementing one of the appropriate safeguarding measures required by law, unless the proposed territories receiving the Personal Data already holds an EU adequacy decision.

Data Security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, associates and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. This means that usually we will retain your Personal Data for up to seven years after our last contact with you, however depending on the commercial circumstances, we may retain your Personal Data for longer.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Please contact us if you would like to know more about the retention period of your Personal Data.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. You have the right to request the following:

- Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law.
- Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

- Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data if you (i) want us to establish the data's accuracy, or (ii) consider our use of the data is unlawful but you do not want us to erase it; or (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request the transfer of your Personal Data to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. Usually, we will respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.