**HML Circuit – Privacy Policy**

HML Circuit Limited (“We”) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.  Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is HML Circuit Limited of 12 South End, Croydon, CR0 1DL.

**1. INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

* Information that you provide to us on the telephone, on our website (www.hmlcircuit.com) (“our site”) or on our mobile application (“our app”). This includes information provided at the time of making bookings for our services or for any other reason if you need to make a complaint or report a problem with our site or our app.
* If you contact us, we may keep a record of that correspondence.  If you contact us by telephone, your telephone call may be recorded.
* We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
* Details of transactions you carry out through our site or our app and of the fulfilment of your bookings.
* Details of your visits to our site and our app and the resources that you access.

**2. IP ADDRESSES AND DEVICE INFORMATION**
2.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.
2.2 We may collect information about your mobile telephone or handheld device (“Device”) or any computer you may use to download or stream a copy of our app onto your Device, including, where available the Device’s or Computer’s unique Devise identifiers, operating system, browser type and mobile network information as well as the Device’s telephone number, for system administration.
2.3 When you use one of our location-enabled services, we may collect and process information about your actual location.  Some of our services require your personal data for the feature to work.  If you wish to use a particular feature, you will be asked to consent to your data being used for this purpose.  Your consent can be withdrawn at any time by switching off the location-based services on your Device.  If you require further details of how we use location based services, you can request such information by contacting us at info@hmlcircuit.com.

**3. COOKIES**
Our website uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.  A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree.  Cookies contain information that is transferred to your computer’s hard drive.  We use Session ID and Persistent Cookies.  These cookies make it quicker and easier to book.  You can block cookies by activating the setting on your browser that allows you to refuse the setting of some or all of the cookies.  However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

**4. WHERE WE STORE YOUR PERSONAL DATA**
4.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.
4.2 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.
4.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site or our app; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**5. USES MADE OF THE INFORMATION**
5.1 We use information held about you in the following ways:

* to carry out our obligations arising from any bookings that you have made with us;
* to ensure that content from our site and our app is presented in the most effective manner for you and for your computer;
* to provide you with information, products or services that you request from us or which we feel may interest you, where (if required to do so) you have consented to be contacted for such purposes;
* to allow you to participate in interactive features of our service, when you choose to do so; and
* to notify you about changes to our service.

5.2 We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or permitted third parties may contact you about these by post, email or telephone.
5.3 If you are an existing customer of ours, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which we have previously supplied to you.
5.4 If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.
5.5 If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please let us know by ticking the relevant box situated on the form on which we collect your data.

**6. DISCLOSURE OF YOUR INFORMATION**
6.1 We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
6.2 We may 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 HML Circuit Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
* 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 and conditions of supply and/or any other agreements; or to protect the rights, property, or safety of HML Circuit Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**7. YOUR RIGHTS**
7.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.
7.2 You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.  You can also exercise the right at any time by contacting us at info@hmlcircuit.com.
7.3 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates.  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.  Please check these policies before you submit any personal data to these websites.

**8. ACCESS TO INFORMATION**
The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

**9. CHANGES TO OUR PRIVACY POLICY**
Any changes we may make to our privacy policy in the future will be posted on this page.

**10. CONTACT**
Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@hmlcircuit.com.