



CUSTOMER PRIVACY NOTICE

1. INTRODUCTION

Welcome to Northern Lights Ltd. and its associated companies' Privacy Notice.

Northern Lights Group Ltd. respects your privacy and is committed to protecting your personal data. This Privacy Notice explains how we collect, use, store, protect and share your personal information, as well as explaining your rights under UK data protection legislation.

Northern Lights Group Ltd. and its associated companies are the **Data Controller** responsible for your personal data.

If you have any questions about this Privacy Notice or how your personal data is processed, please contact:

Data Protection Contact: Zoe Whittle

Email: zoe.whittle@northern-lights.co.uk

Postal- Northern Lights Group

112 Heaton Moor Road

Stockport

SK4 4JY

Telephone- 0161 443 2446

We keep this Privacy Notice under regular review and may update it from time to time.

2. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice explains how Northern Lights Ltd. collects and processes personal data when you:

- Visit our venues;
- Use our website;
- Make reservations or enquiries;
- Subscribe to marketing communications;
- Participate in surveys, competitions or promotions;
- Connect to our guest Wi-Fi services;
- Interact with us through social media; or
- Otherwise provide us with personal information.



It is important that you read this Privacy Notice together with any other privacy notices that may be provided when we collect or process your data for specific purposes.

Please note that there may be circumstances where we process personal data without your specific consent where we are legally permitted or required to do so.

3. THE DATA WE COLLECT ABOUT YOU

Personal data means any information from which an individual can be identified.

We may collect, use, store and transfer the following information:

Personal Information

- Name
- Email address
- Telephone number
- Address (where applicable)
- Date of birth (where required)
- Reservation details
- Transaction and payment information
- Customer service enquiries and communications

Marketing Information

- Marketing preferences
- Newsletter subscriptions
- Promotional communication preferences

Technical Information

When you use our website, we may automatically collect:

- IP address
- Browser type and version
- Device information
- Operating system
- Website usage information
- Time zone settings
- Login information where applicable



Wi-Fi Information

Where you use guest Wi-Fi services, we may collect:

- Contact details provided during registration
- Device identifiers
- Connection data
- Usage information

CCTV Information

For the purposes of crime prevention, security, health and safety, and incident investigation, CCTV systems operate at certain locations.

Images captured by CCTV may constitute personal data.

Special Category Data

We do not routinely collect Special Category Personal Data.

However, customers may voluntarily provide information relating to:

- Food allergies
- Accessibility requirements
- Medical conditions relevant to their visit

Where such information is provided, it will only be processed where necessary to provide services safely and in accordance with applicable data protection legislation.

4. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we require personal data in order to fulfil a booking, provide services, comply with our legal obligations or respond to a request, failure to provide that information may mean we are unable to provide the requested service.

5. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect personal data, including:

Direct Interactions

Information you provide when you:

- Make a reservation
- Submit an enquiry
- Create an account
- Register for guest Wi-Fi
- Subscribe to newsletters



- Complete surveys or competitions
- Submit feedback
- Contact us

Automated Technologies

As you use our website, we may automatically collect technical data using:

- Cookies
- Website analytics
- Server logs
- Similar technologies

If you visit our premises, we may capture your image through CCTV systems.

Third-Party Sources

We may receive information from:

- Analytics providers
- Wi-Fi service providers
- Social media platforms
- Payment processors
- Reservation systems
- Third-party service providers acting on our behalf

Where permitted by law, information gathered from various sources may be combined for the purposes outlined in this Privacy Notice.

6. OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA

We will only process personal data where there is a lawful basis for doing so.

These lawful bases may include:

Contractual Necessity

Where processing is necessary to provide goods or services requested by you.

Legal Obligations

Where processing is necessary for compliance with legal or regulatory requirements.

Legitimate Interests



Where processing is necessary for our legitimate business interests and your interests do not override those interests.

Examples include:

- Managing customer relationships
- Improving services
- Business administration
- Security and fraud prevention
- Health and safety management

Consent

Where you have provided consent, such as for marketing communications.

You have the right to withdraw consent at any time.

7. PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

We may use personal data to:

- Process bookings and reservations
- Provide requested products and services
- Respond to enquiries and customer service requests
- Process payments
- Manage customer relationships
- Improve services and customer experience
- Maintain the security of our premises, systems and website
- Conduct surveys and gather feedback
- Comply with legal and regulatory obligations
- Investigate incidents, complaints or disputes
- Protect the rights, safety and interests of customers, staff and the business

8. PROMOTIONAL OFFERS AND MARKETING

Where permitted by law, we may use your information to send updates about products, services, events and promotions that may be of interest to you.

You may receive marketing communications where:



- You have opted in; or
- You have purchased goods or services from us and have not opted out.

You can unsubscribe from marketing communications at any time by:

- Following the unsubscribe instructions within the communication; or
- Contacting us directly.

Withdrawal of marketing consent will not affect the lawfulness of processing carried out before consent was withdrawn.

9. COOKIES

We use cookies and similar technologies on our website.

You can configure your browser to refuse some or all cookies, or to alert you when cookies are being used.

Please note that disabling cookies may impact the functionality of certain parts of our website.

10. WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

We may disclose personal data to:

- IT and software service providers
- Reservation and booking providers
- Payment processing providers
- Professional advisers including solicitors, insurers and accountants
- HM Revenue & Customs and other authorities
- Law enforcement agencies
- Regulatory bodies
- Providers operating website content or plugins
- Potential purchasers or investors as part of business transactions

All third-party providers are required to implement appropriate security measures and process personal data only in accordance with lawful instructions and applicable data protection legislation.

We do not permit service providers to use personal data for their own independent purposes.

11. INTERNATIONAL TRANSFERS



Some service providers used by the Company may process or store information outside the United Kingdom.

Where personal data is transferred internationally, we ensure appropriate safeguards are in place, including:

- Transfers to countries recognised as providing adequate protection;
- International Data Transfer Agreements (IDTAs);
- Standard Contractual Clauses; or
- Other approved transfer mechanisms.

Further information regarding international transfers is available upon request.

12. DATA SECURITY

We have implemented appropriate technical and organisational measures to protect personal information against:

- Unauthorised access;
- Accidental loss;
- Disclosure;
- Alteration;
- Destruction; and
- Misuse.

Access to personal information is restricted to those with a legitimate business need.

13. DATA RETENTION

We will retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected.

Retention periods may vary depending upon:

- Legal requirements;
- Regulatory obligations;
- Tax requirements;
- Complaint handling;
- Insurance matters;
- Potential litigation.



Where personal information is no longer required, it will be securely deleted, destroyed or anonymised.

14. YOUR RIGHTS

Under UK GDPR, you have the right to:

- Access the personal information we hold about you;
- Request correction of inaccurate information;
- Request deletion of personal information in certain circumstances;
- Object to processing;
- Request restriction of processing;
- Request transfer of personal data where applicable;
- Withdraw consent where consent is relied upon;
- Lodge a complaint regarding data protection matters.

Please note that not all rights are absolute and may be subject to legal exemptions.

Further information about your rights can be found on the Information Commissioner's Office website.

Before responding to requests involving personal information, we may request proof of identity to protect personal data from unauthorised disclosure.

We aim to respond to legitimate requests within one month, although complex requests may require additional time as permitted by law.

We may charge a reasonable fee or refuse to comply where a request is manifestly unfounded, excessive or repetitive, in accordance with applicable data protection legislation.

15. THIRD-PARTY LINKS

Our website may contain links to third-party websites, plug-ins or applications.

We do not control these third-party services and are not responsible for their privacy practices.

We encourage users to read the privacy policies of any external websites they visit.

16. COMPLAINTS

If you have concerns about how your personal data is being handled, we encourage you to contact us first so that we can investigate and resolve the matter.

You also have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office



<https://ico.org.uk/make-a-complaint/>

Document Control

Version: 1.0

Owner: Northern Lights Group Ltd.

Approved By: ZW

Approval Date: 04/08/2026

Review Date: 04/08/2027