

Therme Group Privacy Notice

Introduction

Therme Group is committed to protecting your personal data and respecting your wishes and we want you to be confident that we are. We aim to be clear about when we collect your data and not do anything you would not reasonably expect us to do with your personal data. This policy is to help you understand what personal data we collect, how we use it and how we store it and applies to our websites, services and the ways in which we interact with our stakeholders. Separate Privacy Notices address different areas of our business and are available on our website.

We have reviewed our systems to make it easier for you to choose which communications you receive from us and how you receive them. If you no longer wish to hear from us by email or post, please contact us using the details in the “Contact us” section below.

If you would like to know more about how we collect and use your personal data, please click on the headings below for further information. If you have any further questions, please contact us using the details in the “Contact us” section below.

Any personal data collected will be used and held in accordance with both domestic and EU data protection requirements as dictated by the Data Protection Act 1998, when applicable, the GDPR, and any additional or successor legislation or regulation.

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Who is Therme Group?

When we refer to Therme Group, we are referring to Therme Group RHTG AG, registered at Wienerbergstraße 51, 1120 Vienna, Austria, a Public limited company, with company number FN 364773 g, and its affiliated companies. For further information regarding Therme Group's affiliates, please contact us using the details in the 'Contact us' section below.

Where does Therme Group collect your data from?

- When you provide your personal information directly to us

If you sign up to one of our events, download one of our publications, purchase a product, or communicate directly with our teams for another reason, whether online, on paper, in person, or over the phone, you will be sharing your personal information with us.

- When you provide your personal information through a third-party organisation

From time to time, we work with other organisations such as to sponsor an event. If you provide your personal information to these third parties and indicate that you wish to hear from us such as by receiving a publication, attending an event or signing up to hear our news, the organisation you have contacted may share your details with us (including personal information). For information about the type of information we receive through these third parties, see the section below "What type of information do you collect". To learn how these organisations use your personal information please read their Privacy Policy.

- Publicly available personal information

In some circumstances, we may combine information you provide us with personal information available from external sources such as on your employer's website, in newspapers and magazine articles in the press, or in public records such as Companies House. This might be in order to provide you with a better experience at Therme Group events, to ensure that we are contacting you with information that we feel is relevant to you, or in order that we can provide you with a better and more personal experience in your interactions with us. It also enables us to gain a better understanding of our stakeholders and to improve our products and services.

- Social media

We may refer to personal information available on and through your LinkedIn, Twitter, Instagram and Facebook profiles in order to provide you with a better

and more personal interaction with Therme Group. Your personal settings within those social media accounts and the privacy policies of their website and messaging services will determine what information you have given us, and others, permission to access. Please check your settings and the privacy policies of those sites if you're not sure what permissions you've given.

- When you use our website or apps

So that we can provide you with the best possible experience when you visit our website, we collect cookies when you use our website. This can include the pages you visit and areas that are of most interest. Cookies can also be used to make using the website faster, such as by automatically filling your name and address. Further information about cookies is set out below and in our [cookies policy](#).

In addition, the type of device you're using to access our website or apps and the settings on that device may provide us with information about your device, including the type of device it is, what specific device you have, what operating system you're using, or why a 'crash' has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

What type of information do we collect?

The type of information (including personal information) that we collect and use and what we do with it will depend upon your relationship with us.

If you download a publication, sign up for an event or to receive news updates from Therme Group, the data that we need to collect will vary, but may include:

- Your name;
- Your contact details, including email, telephone number and postal address;
- Your bank or credit/debit card details;
- Health information (only where relevant and necessary to fulfil your request);
- Why you're interested in our publications, news and events;
- The name and address of your employer;
- Your job title;
- If an event is being provided by a third party, the name and contact details of that third-party supplier;
- Details needed to improve your event experience such as dietary requirements or accessibility needs;
- Invoicing information.

Do we ever collect sensitive personal information?

We will rarely collect information classified as “special categories of personal data” or “sensitive personal data”, such as information about your race, religious beliefs, political opinions and health information. We will only do so if there is a clear reason for doing so, such as to enable you to participate in an event, or if we need your health information to ensure your safety at an event.

If you provide us with your bank or credit card details to process a payment over the telephone, we will always ensure that your information is handled securely. We do not store your credit or debit card details at all following the completion of your transaction. All card details are securely destroyed once the payment has been processed. Only staff authorised and trained to process payments will be able to see your card details.

If you make a payment through our website, the payment may be processed through a secure third party and we will not have access to any of your card details. Your card will be processed in accordance with the policies of the processor providing that service that you will be notified of at the time of making payment and we would refer you to their terms and conditions for further information.

How do we use the personal data we collect?

Therme Group uses your personal data in different ways, depending on the nature of our relationship with you.

If you download a publication or register to receive our news or attend an event, we need to collect this data for numerous reasons, in order to:

- provide you with the services, products or information you asked for;
- ensure your safety at an event;
- understand who is accessing our services, publications, events or information;
- keep a record of your relationship with us;
- Make sure we know how you prefer to be contacted;
- Understand how we can improve our services, products or information.

We may also use your data for the following:

- Direct Marketing

We will use the details you provide to us to communicate with you about matters such as future events, news and publications.

We will never send you electronic marketing communications, such as marketing emails, unless we have your express consent that you wish to hear from us in this way. If you do subscribe to Therme Group emails or to hear our news, we will understand that you are granting us the right to use that email address for email marketing.

If you don't currently hear from us by email or receive our e-newsletter and would like to do so, or if you would like to update your preferences, please contact us using the details in the "Contact us" section below. You can also unsubscribe from Therme Group emails by clicking the 'unsubscribe' link at the bottom of any of our emails.

We may contact you by post if we believe we have a legitimate interest in doing so and that contacting you in this way will not have unduly adverse consequences for you. This might be if, for example, you have a history of engaging with us in this way and have not indicated that you no longer wish to receive contact from us by post. If you hear from us via the post and no longer wish to do so, please contact us using the details in the Contact us section below.

We are committed to communicating with you in the way you wish us to and we will always respect your privacy. You can change your mind at any time and it is quick and easy to let us know that you no longer want to hear from us by using the contact details in the Contact us section below or by posting us an updated consent form that you may receive in the post. You can be assured that our team will deal with any request quickly, sensitively, courteously and professionally.

- Personalisation and Profiling

To help us to make sure you're happy to hear from us and happy with what we send you, we may use the personal information that we have gathered in the course of our relationship to tailor our future communications. This includes helping us to understand the likelihood of you responding to an email communication from us, or your likely interest in a future event or publication. The greater understanding of you we can obtain from this information, the more personalised and relevant we aim for our communications to be.

We also carry out targeted marketing activity to ensure that we are contacting you with the most appropriate communication, which is relevant and timely and will ultimately provide an improved experience for you. For example, by providing timely news about the Group, letting you know the different ways you can engage with us and how you can access our services.

You can opt out of your personal data being used for profiling. However, this may mean that you stop receiving marketing communications from us or they become more generic and less relevant to you as they are no longer based on

your interests in our cause. If you do wish to opt-out, please contact us using the details in the “Contact us” section below.

- Sharing Testimonials

To show fellow stakeholders, suppliers, funders, partners, potential partners and customers the great work that we do, we may share testimonials you provide about your engagement with Therme Group. We will not share any information which makes you identifiable unless you have given us express consent to do so.

When might we give your personal information to another party?

We will never share your information with a third party who intends to use it for their own marketing purposes and there are very limited instances where we will share your personal data with a third party. This could include:

- If a third party provides a service to us, such as running an event on our behalf, providing an element of a contract for us, such as email distribution, or fulfilling an order. This would include our trusted partners, entities that sell our products or services or provide our information and marketing for us.
- For the administration of events. For example, an event venue may require the provision of the names and dietary requirements of attendees in advance, for security and health purposes.
- Where there is a legal or regulatory requirement to disclose your personal information such as from HMRC or the courts, we have a genuine and real concern regarding a person’s well-being, or where disclosure is necessary for taxation and criminal investigation purposes;
- where we have your written consent.

How do we keep personal information about you safe?

Therme Group has a number of steps in place to keep your personal information as safe as possible. We train our staff in data protection and data security to increase awareness of its importance. We keep our data protection and data security policies and practices under constant review and review the personal data that we hold, where we hold it and what we do with it.

Therme Group requires the third parties it works with to comply with data protection laws and puts controls in place to ensure that your information is handled safely and appropriately.

Where is your personal data stored?

Your personal data will only be stored or transferred within the UK, EU or US where there are appropriate safeguards in place that have been approved by the relevant regulatory body. Whenever we transfer your personal data out of the EEA, we ensure appropriate protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

How long do we keep personal data about you?

We will only keep information about you for the length of time it is necessary to do so to engage with you in the way that you have requested and in accordance with our legal requirements and tax and accounting rules. When your personal data is no longer needed, we will ensure that it is disposed of in a secure manner. If you would like us to delete any information we hold about you, please contact us using the details in the “Contact us” section below.

What about if you use other websites linked from Therme Group websites?

Therme Group does not have any control over how any third-party websites handle and use your data. Therefore, if you follow any links to third party

sites from Therme Group websites, you must check the Privacy Policy for that organisation in order to understand how your data could be used. This policy does not cover third party websites.

What are Cookies?

Cookies are small text files which are used by websites to learn about your visit to the site and in some cases to tailor your experience on the website. We use cookies to improve your experience of using the Therme Group websites. Find out more about cookies on www.allaboutcookies.org. You can turn cookies off on your computer – please check your computer settings for further information. Turning cookies off could restrict your use of our website.

Some of these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. The data collected is not shared with any 3rd party. The information we get through the use of these cookies is anonymous and we make no attempt to identify you or influence your experience of the site while you are visiting it. If you do not allow these cookies we will not be able to include your anonymous visit in our statistics.

We use cookies on our site that provide functionality, improve performance, help with behavioural advertising and embedded content. We will use a cookie that stores your font size preferences, which allows us to make the size standard throughout the site and we will use a cookie to remember your acceptance of the cookie banner statement.

Contact with Corporate Subscribers under PECR

‘Corporate Subscribers’ are organisations who Therme Group might contact in a professional context, using generic work contact details, including phone, email and post. These contact details may be obtained from public domain sources (company websites etc.), from our own business records or from other companies and business contacts.

Therme Group may contact Corporate Subscribers under the legal basis of Legitimate Interests and as permitted under the PECR (2003) legislation.

We may contact corporate subscribers by email or telephone provided that the subscriber has not previously opted out and is not registered with the Telephone Preference Service (TPS) or its corporate equivalent (CTPS).

Direct Mail is not covered by PECR. We may contact subscribers by mail if they have not previously opted out of receiving such communications.

You have a right to object to the processing of your data for direct marketing. We will provide opt-out notices on our communications to you, or you can advise our team using the contact details in the “contact” section below.

We reserve the right to review this privacy notice in line with any legislative developments over time.

What rights do you have in relation to the personal data we hold about you?

- **The right to see what personal information we hold about you.**

If you would like to know if we are processing any of your personal information or to see the personal information that we hold about you, you can make a request by sending a description of the personal information you wish to see and 2 pieces of identification (so that we can verify your identity) to us using the contact details set out in the Contact us section below. We will get back to you within one month but could take longer (a further two months) if it's a complex request or we get a lot of requests at once.

In order to make sure that we only send information to the right person, we cannot provide this information or accept requests via email.

- **You may have the right to request any of the following in relation to the personal information we hold:**

- To request that we amend personal information that we hold incorrectly;
- deletion of the personal information we hold. We will consider any request on a case by case basis;
- for restrictions to be imposed upon how we process your personal information;
- the right to object to the way in which we process your personal information.

If you wish to exercise any of these rights or have any questions in relation to any of the above, please contact us using the details in the “Contact us” section below. Please note that it may take 28 days for your request to be implemented from the date of the request.

For further information in relation to how you can access and change the information any organisation holds about you, see guidance provided by the Information Commissioner [here](#).

Contact details

- **Internally**

If you would like to complain to Therme Group about our handling of your personal data, please contact dataprotection@thermegroup.com, or by post to the Therme Group Data Protection, Holbrooke House, 34-38 Hill Rise, Richmond TW10 6UA.

- **To a supervisory authority**

If you wish to lodge a complaint or seek advice from a supervisory authority please contact:

The Office of the Information Commissioner
Wycliffe
Water
Wilmslow
Cheshire SK9 5AF
Tel: +44 (0) 01625 545 745
Website: www.ico.org.uk

Will this policy change?

To make sure that this policy and our practices stay legally compliant and up-to-date, we may make changes from time to time. If we make any substantial changes, we will make this clear on our website, or by contacting you directly, if appropriate. To be sure that you don't miss anything, please check back to this page from time to time.

Contact us

If you would like to speak to someone at Therme Group about how we collect, use and store your personal data, if you have any questions, comments, requests or suggestions, please contact us at dataprotection@thermegroup.com, or by post to the Therme Group Data Protection, Holbrooke House, 34-38 Hill Rise, Richmond TW10 6UA.

If you would like to change your contact preferences, please get in touch with us at dataprotection@thermegroup.com

Definitions

We have included a description of how the terms we use are generally interpreted:

- Apps means an application, like one you've downloaded to your mobile or portable device.
- Therme Group means Therme Group RHTG AG, registered at Wienerbergstraße 51, 1120 Vienna, Austria, a Public limited company, with company number FN 364773 g, and its affiliated companies. For further information regarding Therme Group's affiliates, please contact us using the details in the 'Contact us' section.
- Cookies are small text files which are used by websites to learn about your visit to the site and in some cases to tailor your experience on the website created by a website and stored in the user's connected device.
- Direct Marketing means advertising or marketing communication (which could be to sell a product or promoting an organisation) that is directed to particular individuals or companies.
- Personal information means information that identifies you as an individual or is capable of doing so.
- Profiling is the processing of personal data to evaluate information about an individual
- Sensitive Personal Data or Special Category Data means data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.