

Privacy Policy

INTRODUCTION

Welcome to our privacy notice.

We respect your privacy and are committed to protecting your personal information, which we call 'personal data'. This privacy notice will tell you how we collect and process your personal data through your use of this website, how we look after your personal data and about your privacy rights. It supplements any other notices and is not intended to override them. We have tried to be brief and clear. We are happy to provide any additional information or explanation.

WHO WE ARE

UKGP Whalesborough Ltd (Data Controller referred to as 'we/us/our')

Data Protection Manager (**DPM**) – Nigel Angrave – Finance Director, UK Country Parks Ltd, 181 Bridport Road, Poundbury, DT1 3AH. If you have any questions about this privacy policy or our privacy practices, please contact our DPM by email (Nigel@ukcountryparks.com). You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**) (www.ico.org.uk).

CHANGES

This version was last updated July 2023. It is 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 an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, 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.

We may also ask you for information/data that relates to your stay, such as vehicle registration number, the ages of any children staying and where relevant information regarding any pets staying at the property.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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 do not collect any **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, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

HOW WE COLLECT YOUR PERSONAL DATA

Direct interactions. You may give us data orally or by filling in forms or by corresponding with us by post, phone, email or otherwise, for example when you:

- enter into a contract with us or contact us about doing so;
- contact us about any contract we have with you;
- create an account on our website;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some 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 and other similar technologies. For information about the cookies we use, and your ability to refuse them please refer to our separate cookie policy at end of this document.

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to. We have set out below how we plan to use your personal data and the lawful basis for processing including basis of legitimate interest.

- We will use your personal data to register you with our business. This data is necessary for the performance of a contract with you.
- We will use your personal data to perform any contract with you including managing payments, fees and charges, collecting and recovering money owed to us and to address any breach. This data is necessary for the performance of a contract with you and to enable us to recover debts due to us and to ensure compliance with contract terms.
- We will use your personal data to manage our relationship with you which will include notifying you about changes to our terms or privacy policy and about changes to our business which are relevant to you. This is necessary for the performance of a contract with you, to comply with a legal obligation, to keep our records updated and to study how people use our business.
- We will use your personal data to administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). This is necessary for running our business, for the provision of administration and IT services, network security, to prevent fraud, in the context of a business reorganisation or group restructuring exercise and to comply with our legal obligation.
- We will use your personal data where you have purchased a product or service from us this is so we can contact you in respect of any field service actions, warranty matters, product recalls or any similar relevant notifications.
- We will use your personal data to make suggestions and recommendations to you about goods or services that may be of interest to you, to ask you to partake in a review, prize draw, competition or to complete a survey, this will enable us to develop and grow our business.
- We will use your personal information to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This is necessary to enable us to study how people use our business, to develop and grow our business and to inform our marketing strategy.
- We will use your personal data to use data analytics to improve our website, products/services, marketing, relationships and experiences in order to define types of people for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.

PROMOTIONAL OFFERS FROM US

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you.

We may then use your personal data to send you marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

OTHER MARKETING

We will get your express opt-in consent before we use your personal data for any other marketing purpose or share it with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting our DPM.

CHANGE OF PURPOSE

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law. However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

VISITORS TO OUR WEBSITE

If we want to collect personally identifiable information through our website, we will be up front about this. When someone visits our website, we may use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you do not provide personal data to us and this would prevent us from performing the contract we have or are trying to enter into with you, or place us in breach of the law, we may have to cancel our contract. We will notify you if this is the case.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal information with 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 to help us run our business or carry out our obligations to you.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Our professional advisers including lawyers, bankers, auditors and insurers.
- HM Revenue & Customs, regulators and other authorities.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

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. 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 UKGP Whalesborough Ltd or substantially all or either of their assets are acquired by a third party, in which case personal data held by them about its customers will be one of the transferred assets.
- 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 of use or booking terms, terms and conditions of supply of products and other agreements; or to protect the rights, property, or safety of UKGP Whalesborough Ltd, our customers, or others.

INTERNATIONAL TRANSFERS

We do not transfer your data outside the European Economic Area.

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, contractors 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.

HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 requirements. You can ask us about the retention periods for different aspects of your personal data by contacting our DPM. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

You have the right to:

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, 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 in the following scenarios (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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.

If you wish to exercise any of the rights set out above, please contact our DPM.

We do not knowingly collect data relating to children save for ages of children staying at the property when applicable.

No fee usually required. 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 may refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

Use of cookies

When visiting our web pages, we would like to use tracking technologies which record information about you automatically. This can include using a cookie which would be stored on your browser. Without such technology it is possible that certain functionality of this site might be affected. This information does not identify you personally. We automatically collect and store only the following information about your visit:

- The internet domain and IP address from where you access our website.
- The type of browser software and operating system used to access our website.
- The date and time you access our website.
- the pages you enter, visit and exit our website from.
- If you linked to our website from another website, the address of that website.

We use this information to help us identify click stream patterns, to improve our website and to learn about the number of visitors to our website and the types of technology our visitors use. We only use this information to ensure that our web pages stay compatible with a selection of browsers and systems and thereby ensure that the pages appeal to a wide audience. We do not track or record information about individuals and their visits.

If you have any questions about this privacy statement, the practices of this site, or your interactions with UKGP Whalesborough Ltd, please contact us.