

# Privacy Notice

Customers and Holidays



**Pencnwc Holiday Park Limited**

## INTRODUCTION

At Pencnwc we are committed to protecting and respecting your privacy, whilst striving to provide the very best guest experience. We intend to keep your information safe and we want our services to be safe and enjoyable for everyone. We follow strict security procedures on how personal information is stored and used and who sees it to help stop any un-authorised person getting hold of it.

This Privacy policy (and any other documents referred to in it) sets out the basis on which we will process and use any personal information about our website visitors, guests and owners that we collect from them and/or that they provide to us, or that we collect from third parties. Please read this Privacy policy carefully to understand our practices regarding your personal information and how we will treat it.

This document is intended to supplement any other notices and is not intended to override them.

## WHO WE ARE

<b>Data Controller (Park Owner)</b> (referred to as "we/us/our")	Pencnwc Holiday Park Limited		
<b>Other group companies:</b>	If the controller for your data will be another company in the group, we will tell you this when you purchase a product or service with us.		
<b>Name or title of Data Protection Manager:</b>	Daniel Davies		
<b>Address:</b>	<b>Pencnwc Holiday Park, Cross Inn, Ceredigion, SA44 6NL</b>		
<b>Telephone:</b>	<b>01545 560479</b>	<b>Mobile:</b>	<b>07968 759662</b>
<b>Email:</b>	<b>daniel@pencnwc.co.uk</b>		

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the chance to deal with your concerns first.

## **CHANGES**

This version was last updated on 22 May 2018.

It is important that the personal data we hold about you is accurate and current. Every year we send out a customer details form to be completed (static owners and seasonal tourers only), signed and returned to us. Please ensure that this is done and that you keep us informed of any changes which happen outside of completing this form. If you do not fall into these categories please ensure that any data you supply us with is current and relevant.

Any changes that we make to this policy will be uploaded to the website, so please revisit this document frequently to ensure you are aware of any changes.

## **HOW WE COLLECT YOUR PERSONAL DATA**

We may collect and use various types of personal information about visitors to our websites, guests who book a holiday with us and our holiday homeowners.

You may give us data orally or by filling in forms or by corresponding with us by post, phone, email, social media 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;
- Make a booking enquiry
- Confirm a booking
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback.

We may also receive personal data about you from third parties and public sources, including other customers when they interact with us.

Where there are additional members of your holiday party, we will ask how many there are and their age.

We will collect information about your credit or debit card where you use it to pay for our services.

## **HOW WE USE YOUR DATA**

We will only use your personal data when the law allows us to.

We have set out below how and why we plan to use your personal data.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you with our business	Performance of a contract with you  We may also use this information for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes
Providing the products, services and information that you ask us for and performing our obligations to manage your holiday booking or holiday home ownership services	Performance of a contract with you This may include follow up calls to ensure requested information has been received
Responding to messages from and corresponding with you regarding your booking or holiday home ownership services and recording any communications	Performance of a contract with you This may include follow up calls to ensure requested information has been received
To perform any contract with you including:  (a) Managing payments, fees and charges  (b) Collecting and recovering money owed to us  (c) Addressing any breach	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) Necessary for our legitimate interests (to ensure compliance with contract terms)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Notifying you about changes to our business which are relevant to you  (c) Notifying you of any changes to terms and conditions	(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 people use our business)

<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Necessary for our legitimate interests (to develop and grow our business) Some of these suggestions may be linked to changes in health and safety regulations</p>
<p>Asking you to partake in a review, prize draw, competition or complete a survey</p>	<p>Necessary for our legitimate interests (to study how people use our business, to develop and grow our business) This is also part of the community feel of the park through peoples involvement in activities</p> <p>Your data allows us to follow up on our obligation to release prizes and linked media releases as will have been disclosed prior to entry</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Necessary for our legitimate interests (to study how people use our business, to develop and grow our business and to inform our marketing strategy)</p> <p>This also gives us the opportunity to make you aware of new products and events that may be of interest to you</p>
<p>To use data analytics to improve our website, products/services, marketing, relationships and experiences</p>	<p>Necessary for our legitimate interests (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)</p>
<p>To protect our guests, owners and premises from crime, we operate CCTV in all various areas of the park grounds and buildings which records images for security.</p> <p>We will collect and use certain technical information about you and your visit when you visit our website. This may include: IP address of the device you use</p>	<p>This is required to ensure the safety of all our guests, owners and premises.</p> <p>This data is used to help improve our website by ensuring content is relevant and presented well as well as ensuring that it is safe and secure</p>

The pages you visit on our website, whether the page load was successful and the order in which you visit them

The browser which you are using

We may collect certain other information that you give us, e.g., if you take part in discussion boards or other social media functions, participate in a web chat, register with us for and/or enter into competitions or promotions or report problems with our website.

If you are involved in a reportable accident or incident while you are with us, we will record your details and the incident details in our accident book.

The legal basis for our use of this information is your consent. You have the right to withdraw your consent at any time

The legal basis for our use of this information is our legitimate interests in managing our business and developing our services.

## **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.

We combine the information you provide with certain information we obtain from other sources. This can include:

- Electoral roll
- Demographic information
- Other sources

We process this information to:

Improve our ability to present you with offers which may be of interest to you where you have booked or received a quotation for a holiday with us, received a quotation for a holiday home purchase with us or own a holiday home with us.

You have the right to object to us processing this data at any time. If you have not booked or received a quotation for a holiday or holiday home purchase with us, the legal basis for our use of this information is your consent. You have the right to withdraw your consent at any time

## **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.

## **COOKIES**

For information about the cookies we use, and your ability to refuse them please refer to our separate cookie policy which can be found on our website [www.pencnwc.co.uk](http://www.pencnwc.co.uk) or by requesting a copy from the staff at reception.

## **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 behavior 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.

## **THIRD-PARTY LINKS**

Our 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 notice of every website you visit.

## **IF YOU CONTACT US VIA SOCIAL MEDIA**

We do not currently use a third-party provider to manage our social media accounts. If this changes in the future we endeavor to ensure that all data will be stored safely and securely.

## **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 data with third parties to help us run our business or carry out our obligations to you:

Name	Lawful basis for processing including basis of legitimate interest
Other companies in our group	Performance of a contract with you Necessary for our legitimate interests (performing the contract).
Service providers for IT and system administration	Performance of a contract with you Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice).
Our professional advisers including lawyers, bankers, auditors and insurers.	Necessary for our legitimate interests (complying with our legal obligations).
Police and regulatory authorities	To protect our rights and property, safety of our staff guests and assets or when there is an obligatory request by e.g. court order.
HM Revenue & Customs, regulators and other authorities	Necessary for our legitimate interests (complying with our legal obligations).

We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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 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 (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 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.

We do not knowingly collect data relating to children.

**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.