



Spring Lakes Campsite & Fisheries Limited

Privacy Policy July 2021 (next review July 2022)

Purpose

Spring Lakes Campsite & Fisheries Limited is committed to respecting the privacy of its customers and processing your data responsibly. This Policy sets out how we, Spring Lakes Campsite & Fisheries Limited (as a data controller), (“we”, “us”, “our”) comply with our obligations under applicable data protection law. It aims to provide you information on how we collect and process your personal data, whether via our website or mobile app, in connection with a booking or purchase with us or otherwise.

COVID 19

When you visit our site you may need to supply contact details to support NHS Test and Trace. You can find a separate privacy notice for when we collect these details below

The Data We Collect

Personal data is information about you and from which you can be identified. We will collect and process personal data about you in the course of our relationship with you as set out below. Data Collection can be through a variety of channels, including by telephone, via our website or mobile app, on site at our property and via third parties.

Type of Data

Identity Data:

Name, username, age, gender, social media username (if you interact with us through those channels) and your car number plate (may be recorded at our site for the purposes of safety and the prevention of crime)

Contact Data:

Address, email address and telephone numbers

Financial Data:

Bank account and payment card details

Transaction Data:

Details about payments to and from you and other details of products and services you have purchased from us

Technical:

Information about your computer, tablet or mobile device including IP address, browser type, location, browser plug-in types and versions, operating system and platform and other technology on the devices

you use to access this website. Usage of our website using a cookie file stored on the hard drive of your device being used to access the website. You are able to disable these cookies by changing your browser settings, but this may slow down or prohibit access to certain parts or features of our website

Profile:

Purchases made by you, your interests, preferences, registration form details, information provided by you in connection with your stay, feedback, competition and survey responses.

Usage:

Information on how you use our website, products and services including details of the bookings or purchases you make.

Marketing:

Your preferences in receiving marketing communications from us.

CCTV:

Footage in which you may feature when you visit our site.

Accident:

Footage in which you may feature when you visit our site.

If you provide us with personal data about another person, you must ensure that before you do so, you have their agreement to do so and direct them to this Policy.

We may also collect information about you from third parties where this is relevant to our relationship with you. This includes obtaining personal data about you from third parties who provide us with the contact details of individuals who are interested in booking a holiday or other related service with us.

We may require you to provide certain information to us in order to enter into and perform our contract(s) with you or to comply with our legal obligations. Except in these circumstances, your decision to provide personal data to us is generally voluntary and, where it is voluntary, you may choose to withhold and not provide personal data to us. If you choose not to provide certain information to us, we may not be able to accomplish some of the purposes outlined in this Policy.

How We Use it

We use your personal data in the course of our business and in connection with our relationship with you. In particular, your personal data may be used by us, our employees, contractors or agents, and disclosed to third parties. When we process your personal data, we must have a lawful basis for doing so. These are summarised below:

Legitimate interests

Means the interest of our business in conducting and managing it to enable us to give you the best possible service and experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

Performance of a contract

This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.

Legal or regulatory obligation

Means processing your data where necessary for compliance with a legal or regulatory obligation to which we are subject.

Vital interests

Where necessary to protect someone's vital interests (e.g., life or death)

Consent

Where we have your valid consent

For each of these purposes set out below, we have set out the legal basis on which we process your information.

Purpose

To administer booking requests and purchases, including confirming your booking or purchase and otherwise communicating with you about your booking or purchase the recording of telephone calls for training and monitoring purposes to improve our service and train our people.

Legal Basis (depending on the circumstances)

- performance of contract.
- legitimate interests; or consent

Purpose

To provide you with other products and services you request

Legal Basis (depending on the circumstances)

- performance of contract.
- legitimate interests; or consent

Purpose

To manage our relationship and to administer your membership to any membership scheme we provide.

Legal Basis (depending on the circumstances)

- performance of contract.
- legitimate interests; or consent

Purpose

To help us to provide, review, develop and improve our products and services; this may include contacting you (including by email) for market research purposes.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent

Purpose

To use photographs, videos, customer feedback and testimonials for promotional and marketing purposes.

Legal Basis (depending on the circumstances)

- consent

Purpose

To provide you with information that you have requested from us.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent

Purpose

To send you marketing communications in order to boost and improve our business and encourage new and repeat bookings (as further described below).

Legal Basis (depending on the circumstances)

- legitimate interests; or consent.

Purpose

To administer and contact you in relation to prize draws, competitions and other promotional activities.

Legal Basis (depending on the circumstances)

- performance of contract.
- legitimate interests; or consent

Purpose

To customise our website according to your interests and ensure that content is presented in the most effective manner for your computer, tablet or mobile device.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent

Purpose

To allow you to participate in interactive features of our service where you have chosen to do so.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent

Purpose

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including profiling, scoring and segmentation.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent

Purpose

To address any claims made against us; for example, we may share details of our accident logs and CCTV footage with our insurers in connection with any claim made or likely to be made against us.

Legal Basis (depending on the circumstances)

- legitimate interests; or consent in connection with legal proceedings

(i.e., the establishment, exercise or defence of legal claims)

Purpose

To comply with any legal or regulatory obligation (including in connection with a court order)

Legal Basis (depending on the circumstances)

- legal obligation

Purpose

To enforce or apply the agreements we have with or otherwise concerning you (including agreements between you and us).

Legal Basis (depending on the circumstances)

- legitimate interests.
- legal obligation

Purpose

To protect our rights, property or safety or those of our customers, employees or other third parties (e.g., use the use of CCTV at some locations)

Legal Basis (depending on the circumstances)

- legitimate interests.
- legal obligation; or
- vital interests.

When We Share

In connection with the uses referred to above, we may disclose your personal data to certain third parties, including:

- Other companies and entities within Spring Lakes Campsite & Fisheries Limited.
- Services providers who provide IT services, Wi-Fi, system administration, feedback, marketing and market research services (e.g., to send postal mail, email and SMS, maintain and update our databases of customer details, analyse data, collate feedback, survey information, provide marketing assistance (including online targeted advertising), process card payments, provide customer service and handle claims.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HMRC, regulators and other authorities who require reporting or processing activities in certain circumstances.
- Finance providers if you purchase a holiday home.
- To a seller or buyer if we sell or buy any business or assets. In these circumstances, we may disclose personal data held by us to the prospective seller or buyer of such business or assets. If we or substantially all our assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal data held by us will be one of the transferred assets; and
- Other third parties to whom we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation (including in connection with a court order), or in order to enforce or apply the agreements we have with or otherwise concerning you (including agreements between you and us); or to protect our rights, property or safety or those of our customers, employees or other third parties.

You should be aware that, if we are requested by the police or any regulatory or government authority investigating suspected illegal activities to access and disclose personal data concerning your activities whilst using our website, we reserve the right to do so. We also reserve the right to disclose personal data to third parties where a complaint arises concerning your use of our website, and that use is deemed by us inconsistent with the terms governing use of our website.

How Long it is Kept

We will only keep your personal data for as long as is 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 purpose for which it was collected and the potential risk of harm from unauthorised use or disclosure of your personal data and applicable legal requirements.

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.

Security

We take the security of your personal data very seriously. We have put in place appropriate security measures to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, we would draw to your attention the fact that the transmission of information via the internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk.

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 where they are subject to a duty of confidentiality.

We have put in place procedures to deal with any personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Will it be used for Marketing?

Where you have enquired about booking a holiday or purchasing a holiday home or have booked a holiday or purchased a holiday home or where you have purchased any products through our mobile app, we have a legitimate business objective in marketing to you to encourage new or repeat purchases. We will do so in compliance with both data protection and E-Privacy laws. In accordance with your marketing preferences, we will use your personal data to send you newsletters and other marketing communications. We may also collect information about how you interact with our marketing communications (for example, whether you open emails we send to you). This helps us make our marketing more relevant to our customers.

You have the right to object to the receipt of direct marketing at any time. You may do this by sending an email to us at hello@springlakescampsite.com and enter 'Unsubscribe' in the subject line and indicating whether you wish to opt out of holiday marketing, holiday home sales marketing or both.

Alternatively, you can unsubscribe from marketing email communications from us by following the unsubscribe instructions in each email that we send out. This will only unsubscribe you from marketing emails. If you wish to unsubscribe from other channels (post, telephone or SMS) please email hello@springlakescampsite.com.

Please note that you may continue to receive marketing communications for a short period after changing your preferences while our systems are updated.

If you opt out of receiving marketing information from us, we may still use your personal data to provide you with important service communications, including communications in relation to any bookings or purchases you make with Spring Lakes Campsite & Fisheries Limited.

In addition to the above, we may share limited personal data with advertising networks and other third parties to enable those networks and third parties to provide tailored advertising relating to Spring Lakes Campsite & Fisheries Limited to you when you browse the internet and use third party services (such as social media platforms) on the basis of legitimate interests.

Including the Privacy and Electronic (EC Directive) Regulations 2003

Where is your data processed?

In relation to the above uses of your personal data and the above sharing arrangements, your personal data may be transferred to, and stored and processed in, one or more countries outside the European Economic Area (EEA). When we transfer your personal data outside of the EEA, we will ensure a similar degree of protection is afforded to it by at least one of the following safeguards:

- Where the European Commission has deemed that the country has an adequate level of protection for personal data.
- The use of data transfer agreements (standard contractual clauses) approved by the European Commission.
- Certification to the Privacy Shield framework (where the provider is based in the US); or
- Another mechanism permitted by data protection law.

Third Party Websites

This Policy relates only to information that we obtain from you. Our website and mobile app contain certain links to other websites which may be of interest to you.

If you visit a website operated by a third party through a link included on this website or mobile app, your information might be used differently by the operator of the linked website. You should look at that website's privacy policy and take care, particularly if it requires you to submit personal data.

Please also note that we are not responsible for the content that is displayed on these third-party websites.

Use of Cookies

Our website and mobile app use cookies. For more information, please see our Cookies Policy below.

Cookie Policy

Cookies are small text files which are put on to your computer, tablet or mobile device by a website.

We use several cookies and tracking technologies which record information about you automatically as further described below. Among other things, cookies help us to understand user behaviour and make our website work better.

This policy explains how we use cookies so you can understand what they are and what information they collect while you use our website.

You can set up your web browser to refuse cookies, but this means you will not be able to book on our website or use all its features.

By using our website, you agree to us using cookies as set out in this policy.

What we use cookies for

(1) To collect information: This means we can learn more about how you use our website so we can improve your online experience.

(2) To dynamically tailor your experience and provide functionality: Cookies allow us to provide you with information, products and features that we think you will find interesting.

(3) To make our marketing more relevant: We can show you relevant offers and promotions on this website and through our advertising networks.

Information which we collect when you visit

We automatically collect and store 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.
- your clicks and movement through our website, including the pages you enter, visit and exit our website from; and
- if you linked to our website from another website, the address of that website, or if you have visited our website by clicking on a link in an email sent to you.

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, as well as the effectiveness of our email marketing. We 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.

Types of cookies we use

The following are the types of cookies we use on our website and some more details about what they are used for:

Type of Cookie

STRICTLY NECESSARY COOKIES

These cookies allow us to make sure you get the best possible experience on our website and its features and functions. They are essential for you to be able to use the features and functions of our website, and to search and buy online with us.

ANALYTICAL / TESTING COOKIES

These cookies help us understand how our customers are using the website and how our website operates so we can make things better. We can also use this information to measure the effectiveness of our marketing and to test our website.

BEHAVIOURAL / FUNCTIONAL COOKIES

These cookies help us provide you with an online experience that is tailored to your needs. They help us show you the most relevant content, based on your preferences. For instance, these cookies ensure that you are shown the correct contact details on our website.

We also use these cookies in connection with features and services you use on our website, such as watching a video, publishing content to your social media feed or using our Live Chat function.

MARKETING COOKIES

Marketing cookies can be used by us and our partners. They allow us to interact with you on our website and once you have left our website - by showing you an advert for example - to help you find the holiday

that is right for you. We also use these cookies to measure the effectiveness of our advertising and to determine the frequency with which you are shown a particular advertisement. We also use these cookies to send you marketing communications in accordance with your preferences.

ADALYSER

An analytics platform that is used to measure response to TV advertising.

Understanding cookies - the nitty gritty

This section supplements the preceding sections and contains further information about what cookies are and how we use them.

What are cookies?

Cookies are small text files placed on your computer, tablet or mobile device by us or our partners. They let us identify the device you are using. This information is sent back to our systems as you move around our website.

Cookies are unique to the web browser you are using - so if you are using a desktop computer as well as a mobile, different data will be collected for each.

You can find more information on the All About Cookies website (<http://www.allaboutcookies.org/>).

Cookies can be set by the owner of the website you are on. These are known as 1st Party Cookies. There are also 3rd Party Cookies that can be set by partner websites.

You can choose to accept all cookies, reject 3rd Party Cookies or reject all cookies by changing your internet browser settings. If you do not accept cookies, some features of our website will not work. For example, you will not be able to make a booking.

How we use cookies

We use cookies to find out more about how you use our website such as - searches you make, parks, regions or periods of interest and your preferences. We use this to:

- Make it possible for you to use our website.
- Show you information and offers that are relevant to you.
- Find out more about how you and our other customers use the site.

Improving your experience

We use cookies and software programmes to record, measure and analyse how our customers use our website. We use this information to understand what you want from our website, which helps us to constantly improve your online experience.

We can also find out how you move around our website, so we can investigate any errors stopping you from being able to do what you want. The data we collect from cookies is important for us to improve your experience.

Making your experience personal

Cookies help us to personalise your experience by letting us know how you are using our website on your computer or device, which means we can work out what's most relevant to you.

Adverts on other websites

If you visit one of our partner sites, you might see an advert that is relevant to what you searched for when you last visited our own site. We work with advertising networks that use cookies to collect information on your preferences, meaning we can show adverts that are better tailored to you.

Refusing cookies and changing your mind after you have accepted

Refusing cookies

You can change your browser settings to accept or refuse all cookies, choose which cookies you want or do not want, or ask to be notified when a cookie is set. Use the help feature in your browser to see how.

Changing your mind after you have accepted our cookies

If you change your mind after you have accepted cookies, you will find an option within your internet browser to clear cookies that have already been set. Use the help feature in your browser to see how. You will then need to change your browser settings to refuse cookies in future.

Just so you know, you will not be able to benefit from all the features of our website or book online with us if you refuse cookies.

Find out more on cookies

Look at these websites for more information on cookies:

<http://www.youronlinechoices.com/uk/>

<http://www.allaboutcookies.org/>

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Updates

If we decide to change this policy, we will post the updated policy on this website. The updated policy will take effect as soon as it is posted on our website. This policy was last updated in July 2021.

YOUR LEGAL RIGHTS

You have certain legal rights with respect to your personal data. These include the right to:

Request access

to your personal data (commonly known as a 'subject access request'). This enables you to receive a copy of the personal data we hold about you.

Request correction

of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we 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. Note, however, that on occasion we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you 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 certain cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing

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.

Where you wish to exercise any of the rights set out above, please contact the Data Protection Officer (contact details below). 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 or refuse to comply with your request if it is clearly unfounded, repetitive or excessive.

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 several requests. In this case, we will notify you and keep you updated.

Your Rights and Complaints

If you have a question or wish to complain about how your personal data is used, you should contact our Data Protection Officer for further information.

Email

hello@springlakescampsite.com

Post

Data Protection Officer
Spring Lakes Campsite & Fisheries Limited
Spring Lodge
Eastcott
Bude
Cornwall
EX23 9PL

If you are still not satisfied, you can complain to the Information Commissioner's Office. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

casework@ico.org.uk

We keep our privacy notice under regular review, and we will make new versions available on our website. This privacy notice was last updated on 01 July 2021.