

# SLENINGFORD WATERMILL COMPANY LIMITED

## GENERAL PRIVACY NOTICE FOR GUESTS

### INTRODUCTION

Welcome to our privacy notice. We respect your privacy and are committed to protecting your personal information (your “personal data”). This privacy notice will tell you 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 are happy to provide further information or explanation if required.

### WHAT IS PERSONAL DATA?

The Information Commissioner’s Office defines personal data as “any information relating to an identifiable [living] person who can be directly or indirectly identified, in particular by reference to an identifier”. Your name, address, email address, telephone number are just a few examples of personal data. Identification can be by the information alone or in conjunction with other information.

### WHO ARE WE?

This privacy notice is provided by Sleningford Watermill Company Limited, which is the *data controller* for your data (referred to in this document as “we/us/our”).

Please contact the Data Protection Manager if you have any questions about this Privacy Notice or the information we hold about you, or to exercise your rights under the General Data Protection Regulation at:

Katherine Lawrence (Data Protection Manager)  
Sleningford Watermill Caravan Park, North Stainley, Ripon, North Yorkshire, HG4 3HQ  
[contact@sleningfordwatermill.co.uk](mailto:contact@sleningfordwatermill.co.uk)  
01765 635201

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO). We would appreciate the opportunity to deal with your concerns first. You can contact the Information Commissioner’s Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

### HOW DO WE COLLECT YOUR PERSONAL DATA?

You may give us data orally or by filling in forms (either on paper or online) 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;
- Request marketing or other information to be sent to you;
- Enter a competition or complete a survey;
- Give us some feedback.

We may also receive personal data about you from third parties (from other customers interacting with us, who may put a booking in on your behalf).

## **WHAT DATA DO WE PROCESS?**

We process some or all of the following data where necessary to perform our tasks:

- Names, titles, gender, age group, nationality;
- Contact details such as address, email address, telephone numbers;
- Number and registration of vehicles, number and description of any dogs, specifications and dimensions of the unit that you are bringing (e.g. tent, caravan) and any accessories;
- When and where you will be staying on our site;
- Whether your booking is affiliated with another booking;
- Any additional data you may feel appropriate to disclose to us to help us accommodate you better, which may constitute sensitive personal data (such as information about a disability or any other physical or mental health issue);
- The age of any children you may bring with you;
- In the case of a cancelled booking, where the circumstances are such that we agree to carry forward a paid deposit as credit against a future booking, you may provide sensitive personal data surrounding the reason for your cancellation;
- If you are a seasonal guest, we also process further details about your caravan, such as its serial number, future pitch preferences, emergency contact names/numbers and information about your insurance policy;
- Financial identifiers such as payment card numbers, payment/transaction identifiers or bank account details.

## **HOW IS YOUR PERSONAL DATA PROCESSED?**

We will only use your personal data when the law allows us to. We will comply with our legal obligations to:

- Keep personal data up to date;
- Store and destroy personal data securely;
- Not collect or retain excessive amounts of personal data;
- Keep personal data secure;
- Protect personal data from loss, misuse, unauthorised access and disclosure;
- Ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- To enable you to enter into a contract with us (in order for you to be able to visit Sleningford Watermill Caravan Park as either a touring or seasonal guest);
- To enquire about aspects of your booking;
- To notify or remind you of any outstanding deposit or balance due;
- To contact you with information relating to your visit in advance of your stay;
- To address any breach of contract;
- To contact you in the case of an emergency;
- To notify you of changes to our terms, Privacy Policy, services or business;
- To enable us to meet legal and statutory obligations;
- To maintain our own accounts and records;
- To seek your views or comments;
- In rare cases, we may retain some of your personal data indefinitely in order to identify repeat bookings that we do not wish to accept.

## **WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?**

In each case we may rely on three reasons to do so. These are:

- The performance of a contract with you;
- Because it is necessary to comply with a legal obligation;
- Because it is necessary for our legitimate interests.

These three reasons for using your personal data overlap and there may more than one ground to justify our use of your personal information on any occasion. If we were to use your information other than in accordance with one of these legal bases we would always obtain your consent prior to its use.

## **SHARING YOUR PERSONAL DATA**

Your personal data will be treated as strictly confidential. We will only share your details with third-parties in order to carry out our obligations to you, to help us run our business and to comply with our legal obligations.

Third parties who may have your personal data shared with them include:

- Service providers (for IT and system administration, payroll, pension and other employment benefits) – necessary for the performance of a contract with you and for our legitimate interests (performing the contract, using your data as we have described in this notice);
- Our professional advisers (lawyers, insurers, bankers and auditors) – necessary for our legitimate interests (complying with our legal obligations and helping us develop and grow our business);
- HM Revenue and 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 third parties 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.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

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 Data Protection Manager. In general, we will endeavour to keep data only for as long as we need it. We will destroy your data securely when it is no longer needed.

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.

## 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.

## 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.

## 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.

## INTERNATIONAL TRANSFERS

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

## COOKIES

Sleningford Watermill Caravan & Camping Park Ltd ("us", "we", or "our") uses cookies on <http://sleningfordwatermill.co.uk/> (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

## MARKETING

At present we do not engage in marketing communications. If we wished to use your personal data for this purpose in the future, we would provide you with a new notice explaining this new use prior to this and seek your prior consent to this new form of processing.

## 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.

## YOUR RIGHTS AND YOUR PERSONAL DATA

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.
- **Lodge a complaint** with the Information Commissioner's Office.

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.

## CHANGES

As and when the Privacy Policy is updated, historic versions will be obtainable by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.