

## INTRODUCTION

Aboyne Loch Caravan Park, which we call “ALCP” respect your privacy and are committed to protecting your personal information, which we call “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 have tried to be brief and clear. We are happy to provide any additional information or explanation.

## WHO WE ARE

<b>Data Controller (Park Owner)</b>	<b>Aboyne Loch Caravan Park</b>
Name or title of Data Protection Manager:	Heather Reid
Address:	Aboyne Loch Caravan Park Aboyne AB34 5BR
Telephone:	013398 86244
Email:	info@aboynelochcaravanpark.co.uk

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)). We would appreciate the chance to deal with your concerns first.

## **CHANGES**

This version was created on **24/05/2018**.

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

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

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:

- purchase a holiday home from us or contact us about doing so;
- contact us about any purchase you make;
- request information or marketing to be sent to you;
- complete a cylinder refill agreement with us which is sent to a third party
- 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 and (if applicable):

Things you do	What information is collected	What is it used for	Our Legal Grounds for collecting information
<b>Browse the website (cookies)</b>	Information about your computer, such as which browser you are using, your network location, the type of connection you are using (e.g. broadband, ADSL etc) and your IP address. This is done through cookies	Improving content and functionality on our website.	Legitimate interests of ALCP to improve its services. The level of information gathered is not intrusive as it is only used to determine if the website works well and to enable ALCP to improve its services.
<b>Submit an enquiry via Website</b>	If you submit an enquiry via the website we will collect the following information; <ul style="list-style-type: none"> <li>- name</li> <li>- phone number</li> <li>- any other information you provide in the message</li> </ul>	All the information we request from you is needed in order to provide availability and pricing details, in relation to your search.	To enable us to contact you to answer your enquiry.
<b>Searching for a break</b>	If you search for a break we will collect the following information: <ul style="list-style-type: none"> <li>· Details of people staying on site.</li> <li>· the type of break your looking for touring/hire etc</li> <li>· arrival and departure dates;</li> </ul>	All the information we request from you is needed in order to provide availability and pricing details, in relation to your search.	Taking steps at your request prior to entering into a contract. To ensure we can complete the performance of our contract with you we require you to provide the stated information.

<b>Things you do</b>	<b>What information is collected</b>	<b>What is it used for</b>	<b>Our Legal Grounds for collecting information</b>
<b>Booking a break</b>	<p>If you book a break, we need the following information as a minimum:</p> <ul style="list-style-type: none"> <li>· your name</li> <li>· email address</li> <li>· postal address</li> <li>· telephone number and type</li> <li>· details of other people staying</li> <li>· the holiday pitch or unit number</li> <li>· arrival and departure dates</li> <li>· Car registration number</li> <li>· financial details for payment.</li> </ul>	<p>All of the information we request from you is needed in order to book and provide your break. We cannot provide your break without it.</p>	<p>Performance of a Contract</p> <p>To allow us to complete the performance of our contract with you we require you to provide the stated information.</p>
<b>Own a holiday Home</b>	<ul style="list-style-type: none"> <li>· your name</li> <li>· email address</li> <li>· postal address</li> <li>· telephone number and type</li> </ul>	<p>All of the information we request from you is needed in order to own a holiday home.</p> <p>We will use the information in order to send out invoices relating to a sale and any other relating business.</p>	<p>Performance of a transaction</p> <p>To allow us to complete the transaction with you we require you to provide the stated information.</p> <p>Required by law.</p>

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you with our business	Performance of a transaction with you
To perform any transaction with you including: <ul style="list-style-type: none"> <li>(a) Managing payments, fees and charges</li> <li>(b) Collecting and recovering money owed to us</li> <li>(c) Addressing any breach</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a transaction with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> <li>(c) Necessary for our legitimate interests (to ensure compliance with Park terms)</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>(a) Notifying you about changes to our terms or privacy policy</li> <li>(b) Notifying you about changes to our business which are relevant to you</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a transaction with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how people use our business)</li> </ul>

Information collected while you are visiting ALCP

Things you do	What information is collected	What is it used for	Our legal grounds for collecting information
<b>On Park incidents</b>	Records of accidents and treatments received.	We are required by law to keep a record of accidents and treatments. Required by law and in order to exercise and defend our legal rights.	Legitimate interests of ALCP to improve its services.

At Anytime

<b>Things you do</b>	<b>What information is collected</b>	<b>What is it used for</b>	<b>Our Legal Grounds for collecting information</b>
<b>Contacting us</b>	If you ring our office to make an enquiry the following information is collected, as a minimum: <ul style="list-style-type: none"><li>· name;</li><li>· contact details</li><li>· nature of enquiry.</li></ul>	This information is used to resolve the enquiry, or progress a complaint as appropriate. This will be recorded into the relevant recording systems. The information will also be used to enable us to learn and continually improve the quality of the service we provide.	The legitimate Interests of ALCP to provide customer services and provide you with an appropriate response to your query. We may also use this information in order to exercise and defend our legal rights.

## **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

## **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**

Your messages will be stored as follows:

Name of provider: Facebook, Twitter, Instagram

Retention period for messages: Will be deleted only at your request

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

If you do not provide personal data to us and this would prevent us from performing the transaction we have or are trying to enter into with you, or place us in breach of the law, we may have to cancel our transaction. 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:** Performing any sale with you. Necessary for our legitimate interests.

**Service providers for IT and system administration:** Performing any transaction with you. Necessary for our legitimate interests (performing the transaction, 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).

**HM Revenue & Customs, regulators and other authorities:** Necessary for our legitimate interests (complying with our legal obligations).

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.

## **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 transaction 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.