

Privacy Notice

Dated: April 2022

Guests – if you have made a booking, enquiry or visited our website

1. Important information and who we are

This privacy notice provides information on how we collect and process your personal information when you make a booking or booking enquiry through us, visit our website, contact us or use our services. This privacy notice is separate to our booking conditions and other important information available on our website and does not replace or supersede them.

We are Whitsand Bay Fort Holiday Village Ltd ("we" or "us").

We, as controller, are responsible for your personal information. We will keep your personal information secure and use the information you provide only in accordance with applicable privacy and data protection legislation and the terms of this privacy notice.

. What personal information do we collect and how?

We will only process personal information about you when we need to and this may include:

- Name
- Contact details including phone number, email address and home address
- Payment details
- Date of birth
- Booking information
- Information gathered via cookies (please see our Cookie Policy for more information)

If you are making a booking on behalf of other people, this privacy notice will apply to all personal information that you have provided on their behalf, and you are required to bring this privacy notice to their attention.

We will only collect special categories of personal information where this is required by us or our suppliers to provide our service to you. We will only process this information to meet your specific requirements (for example, where you provide us with health information, including any difficulties with mobility, in order for us to ensure that your requirements can be met) or where we are required to do so.

We will generally collect personal information directly from you. If you have booked via one of our booking partners, we will receive your information from them. We may also receive your information from other guests in your party.

The provision of some personal information is a legal or contractual requirement and if you do not provide it, we may not be able to enter into or perform the contract with you and, we can cancel your booking. We will tell you if this is the case and will not be liable to you.

3. How do we use your information and why?

We will only use personal information for certain reasons and when one or more of the following lawful bases apply:

- Where we need to process personal information in order to perform the contract we have entered into with you, or take steps to enter into a contract with you
- Where we have your consent
- Where we need to comply with a legal obligation
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

In order to process special categories of personal information, we must have additional justification to do so and will only process this type of information where we have your explicit consent, where you have made the information public, in relation to legal claims or where it is necessary for reasons of substantial public interest.

We may use your personal information for any of the below purposes and have explained the lawful bases we rely on, and where necessary, our legitimate interest.

PURPOSE FOR PROCESSING	LAWFUL BASIS FOR PROCESSING	LEGITIMATE INTEREST (WHERE APPLICABLE)
To enable us to complete your booking or related travel arrangements	Contract Consent	
To manage your account with us	Consent Legitimate interests	Record keeping and providing good customer service
To invite you to leave a review about our services	Legitimate interests	Understanding the perception of our business and improving our services
To send service messages, including booking updates and changes to our terms and conditions	Contract Legitimate interests	Keeping our customers updated
To provide details or information you may have requested	Consent	

PURPOSE FOR PROCESSING	LAWFUL BASIS FOR PROCESSING	LEGITIMATE INTEREST (WHERE APPLICABLE)
To manage customer service queries, including complaints and call recording	Legitimate interests	Improving our service, staff training, record keeping and resolving issues
To personalise our services to you, for example regarding any repeat visits to our websites	Consent	
To carry out marketing activities	Consent Legitimate interests	Working out which of our services you may be interested in and telling you about them
For statistical purposes	Legitimate interests	Evaluating our range of services or the success of our services
In the event of a travel crisis or other unforeseen travel incident whereby we may need to provide your contact details to a third party to provide you emergency assistance	Legitimate interests	Protecting our business and customers
To comply with a legal obligation, process or request	Legal obligation	
To comply with government advice or guidance	Legal obligation	
Enforce our booking conditions and other agreements, including investigation of any potential breach	Contract Legitimate interests	Protecting our business
Detect, prevent or report crime	Legal obligation Legitimate interests	Protecting our business and customers Assisting law enforcement and government bodies

PURPOSE FOR PROCESSING	LAWFUL BASIS FOR PROCESSING	LEGITIMATE INTEREST (WHERE APPLICABLE)
Address security, fraud or technical issues	Legal obligation Contract Legitimate interests	Protecting our business and customers Assisting law enforcement and government bodies
Protect the rights, property or safety of us, our users, owners, customers, employees, contractors, a third party or the public	Legal obligation Contract Legitimate interests	Protecting our business, customers, third parties and the public
To test, develop and improve our services	Legitimate interests	Improving our business
To establish, exercise or defend our legal right	Legitimate interests	Protecting our business

4. Who will you share my personal information with?

We may share your personal information with:

- owners or agents of holiday cottages, holiday parks and boatyards
- our employees and contractors as is necessary in order to provide our services to you
- service providers, acting as processors who provide IT, system administration services, website hosting and support, marketing and other services
- professional advisors, including bankers, lawyers, auditors, accountants and insurers who provide us with services
- our preferred insurance provider(s) (if you purchase the personal travel insurance policy we offer)
- credit/debit card companies
- payment service providers
- government agencies, regulators and other authorities
- third parties who we may need to work with to deliver services or fulfil travel plans on your behalf, for example resorts, holiday parks, management companies, owners' associations
- third party booking or distribution platforms, travel agents and booking partners
- customer review companies and marketing service providers
- third parties that we may choose to sell, transfer, or merge parts of our assets or business to or with and businesses we acquire or merge with

- third parties you have authorised us to speak to, including ABTA

Third parties are required to process your personal information in line with data protection legislation. Where a third party is acting on our behalf, we do not allow them to use your information for their own purposes and we ensure they have appropriate security measures in place to protect your information.

5. Updating Your Details?

It is important that the personal information we hold about you is accurate and correct. Please tell us if your personal information changes during your relationship with us.

If you would like to change any of your personal information or preferences relating to the way in which we use your personal information, including for direct marketing, get in touch (see our contact details in section 11).

6. How long will we hold your information for?

We will only keep your information for as long as necessary. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, any legal or regulatory requirements and any relevant industry standards or guidelines. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner or anonymised so that it can no longer be associated with you.

7. Your rights

Under certain circumstances, you have the right to:

- **Request access** to your personal information (commonly known as a "subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request rectification** of the personal information that we hold about you. However, if it remains inaccurate or incomplete, you can request that this be corrected or completed.
- **Request erasure** of your personal information (commonly known as the "right to be forgotten"). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on legitimate interests to process it or using it for direct marketing.
- **Request restriction** of the processing of your personal information. This enables you to ask us to limit the way we process your personal information, for example if you dispute the accuracy of the information we hold about you.

- **Data portability**, which enables you to receive the personal information you have provided to us in a structured, commonly used and machine-readable format or request that we transmit it directly to a third party.
- **Withdraw your consent** where we rely on your consent to process your information.

You are not required to pay any charge for exercising any of these rights, unless your request is unfounded or excessive, in which case we may charge you a reasonable fee or refuse to comply with the request. We may need to request information from you to help us confirm your identity and identify the information you are referring to. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you wish to exercise any of these rights, get in touch (see our contact details in section 11). We aim to respond to requests within one month. If your request is particularly complex, we are permitted to extend this by two months and will notify you of this. You may not have a right to information if we have responded to a request previously and you have made a repeat request without a reasonable period of time passing between the requests.

8. Does this privacy notice apply to linked websites?

Our websites may contain links to other websites. This privacy notice only applies to this website. Linked websites will have their own privacy policies that you should read to understand what information they collect about you and how they use it. We do not accept any responsibility or liability for these policies.

9. Who can I contact if I have queries about this privacy notice?

You can contact us if you have any questions about our privacy notice or our use of your personal information by email to office@whitsandbayfort.co.uk or by writing to us at Data Protection Manager, Whitsand Bay Fort Holiday Village Ltd, Donkey Lane, Torpoint PL10 1JZ, United Kingdom.

You have the right to raise concerns about our use of your personal information with the Information Commissioner (<https://ico.org.uk>) at any time, but we encourage you to contact us in the first instance so that we may discuss your concerns.

Why are your card details safe?

Our Secure server software (SSL) is the industry standard and is among the best software available today for secure commerce transactions. It encrypts ALL OF YOUR PERSONAL INFORMATION, including your credit or debit card number, name and address, which means that your details cannot be read as the information travels over the internet. Only Whitand Bay Fort Holiday Village Ltd. can read your personal information.

Equally, as required by the UK Data Protection Acts of 1984 and 1998, we follow strict security procedures in the storage and disclosure of information provided by our customers.

In the extremely unlikely event that your card details are obtained and used fraudulently, most banks and credit card providers will either cover all charges resulting from this unauthorised use of your credit details or will limit your liability to £50. Please check your card agreement to establish your coverage for liability.

Did you know? The risk of credit card fraud is 100 times greater when you hand your card to the waiter in a restaurant than when you shop on the Internet! Modern day encryption technology, used by many websites like ours, virtually eliminates credit card fraud on the Internet.