



Privacy Policy

for

**STRATHEARN LEISURE LIMITED
trading as Seafield Caravan Park
and The Ocean Club**

INTRODUCTION

Strathearn Leisure Limited, trading as Seafield Caravan Park and The Ocean Club is committed to protecting and respecting your privacy.

We take your privacy very seriously, respect your rights to privacy and are committed to protecting your personal information, which we call “personal data”.

This privacy policy (together with our terms of use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This policy supplements any other policies 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

Data Controller (Park Owner) (referred to as “we/us/our”)	Strathearn Leisure limited, trading as Seafield Caravan Park & The Ocean Club		
Other group companies:	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.		
Name or title of Data Protection Manager:	Allison Britton		
Address:	Seafield Road Seahouses Northumberland NE68 7SP		
Telephone:	01665 720 628	Mobile:	n/a
Email:	info@seafieldpark.co.uk		

We would appreciate the chance to deal with your concerns first, however, you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) (www.ico.org.uk).

CHANGES

We keep our privacy policy under regular review and we will make any updates available through our website. This version was last updated on **17 April 2018**. Historic versions can be obtained 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. You can do this by telephone (01665 720 628), email to info@seafieldpark.co.uk or by post to Data Protection Manager, Seafield Caravan Park, Seafield Road, Seahouses, NE68 7SP.

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, online 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 to be sent to you;
- you complete our on-line forms or when you provide personal information on our website;
- you book and/or pay for accommodation, touring pitches, appointments, fitness classes or events that we provide;
- you complete any “contact us” forms or claim forms
- enter a competition, promotion or survey;
- give us some feedback.

WHAT INFORMATION IS COLLECTED

The information collected may include:

- name and job title
- date of birth
- contact information including e-mail address
- national insurance number
- occupation and company details
- other information relevant to your enquiry

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.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as an employee with our business	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)
Recruitment and selection	a) Necessary to comply with a legal obligation
To register you with our business	a) Performance of a contract with you
To perform any contract with you, and provide you with the best service possible, 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)

<p>To manage our relationship with you which will include:</p> <p>a) Notifying you about issues relevant to your contract with us</p> <p>b) Notifying you about changes to our terms or privacy policy</p> <p>c) Notifying you about changes to our business which are relevant to you</p>	<p>a) Performance of a contract with you</p> <p>b) Necessary to comply with a legal obligation</p> <p>c) Necessary for our legitimate interests (to keep our records updated and to study how people use our business)</p>
<p>To provide information relating to us if you indicate that you want to receive marketing material or similar communications</p>	<p>a) You have given clear consent for a specific purpose</p> <p>b) Performance of a contract with you</p> <p>c) Necessary for our legitimate interests (to develop and grow our business)</p>
<p>To administer and protect our business and our website</p> <p>(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>a) Necessary for our legitimate interests (to develop and grow our business)</p>
<p>Asking you to partake in a review, prize draw, competition or complete a survey</p>	<p>a) Necessary for our legitimate interests (to study how people use our business, to develop and grow our business)</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>a) 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>To improve our products/services, relationships, experiences, website and marketing, and use data analytics for this purpose</p>	<p>a) 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>

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 **opted in** to receiving that marketing.

OTHER MARKETING

We will get your express opt-in consent before we use your personal data for any other marketing purpose. We will not share your personal data with any third party for marketing purposes.

OPTING OUT

Our marketing e-mails will contain an opt-out button. Please use this button if you would like us to stop sending you marketing material.

Alternatively, you can ask us or third parties to stop sending you marketing material at any time by writing to our Data Protecting Manager at Seafield Caravan Park, Seafield Road, Seahouses, NE68 7SP.

COOKIES

Our website uses cookies to distinguish you from other users of our site. Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

Users are advised that if they wish to deny the use and saving of cookies from our website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from our website.

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.

CRIME PROTECTION OR PREVENTION

We reserve the right to pass any or all of your personal information to the police or any other relevant body for the purposes of crime protection or prevention or for any purpose associated with your misuse, or suspected misuse of our property; facilities; clients or website or in relation to any legal proceedings or prospective legal proceedings.

VISITORS TO OUR WEBSITE

Like most websites, there is certain information that is automatically tracked by the internet service provider, including the website you just came from, which URL you go to next, the browser you are using and any searches you have done.

When someone visits our website, we may use a third-party service to collect this standard internet log information and details of visitor behaviour 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 any individual.

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

We use third-party providers to manage our social media accounts.

Communication, engagement and actions taken through external social media platforms that we and our website participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

You are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. Either directly or through our website, we will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

Our website and email communications may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

[Facebook Privacy Policy](#)

[Google Privacy Policy](#)

[Instagram Privacy Policy](#)

[Mailchimp Privacy Policy](#)

[Twitter Privacy Policy](#)

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.

Third parties may process information on our behalf, and will have incidental access to your information. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only allow our third-party service providers to use your personal data for specified purposes and in accordance with our instructions.

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 policy.

Name	Lawful basis for processing including basis of legitimate interest
Seafield Caravan Park The Ocean Club	a) Performance of a contract with you b) Necessary for our legitimate interests (performing the contract).
Infinium Service providers for IT and system administration	a) Performance of a contract with you b) Necessary for our legitimate interests (performing the contract, using your data as we have described in this policy).
Arthur J. Gallagher Service providers for caravan insurance	a) Performance of a contract with you b) Necessary for our legitimate interests (performing the contract, using your data as we have described in this policy).
Walter Dunn Caravan Services Repairs, installation, plumbing & heating	a) Performance of a contract with you b) Necessary for our legitimate interests (performing the contract, using your data as we have described in this policy).
Leisure Personal Trainers Private client personal fitness training services	a) Performance of a contract with you b) Necessary for our legitimate interests (performing the contract, using your data as we have described in this policy).
Our professional advisers including lawyers, bankers, auditors and insurers.	a) Necessary for our legitimate interests (complying with our legal obligations).
HM Revenue & Customs, regulators and other authorities	a) Necessary for our legitimate interests (complying with our legal obligations).

INTERNATIONAL TRANSFERS

Seafield Caravan Park currently use “RMS – the Hospitality Cloud” as its property and client management system for the caravan park operations. With customers in over 25 countries around the world, and significant operations in the United Kingdom and Europe, RMS adheres to the General Data Protection Regulation and has made enhancements across the board to their product, data centres, contracts, internal processes and documentation. RMS is compliant to the extent required for the General Data Protection Regulations and will continue to comply on an ongoing basis.

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” requirement. 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 Data Protection Manager.

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.