



**BENNANE SHORE**  
HOLIDAY PARK + SPA

## Privacy Notice



**PEBBLES**  
SPA + LEISURE

We 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. This is the latest version of our policy which is updated from time to time. This policy is dated May 2018.

### Who We Are

BENNANE SHORE HOLIDAY PARK LTD

trading as Bennane Shore Holiday Park and Pebbles Spa & Leisure

Data Protection Manager: Andrew Brown

Address: Bennane Shore Holiday Park, Lendalfoot, Girvan, KA26 0JG

Telephone: 01465 891233

Email: [info@bennaneshore.com](mailto:info@bennaneshore.com)

Any reference to "we", "us" or "our" in this policy shall mean Bennane Shore Holiday Park Ltd and our associated trading names.

Throughout this policy "you" means the customer.

Under the General Data Protection Regulation 2018, we constitute the 'data controller and processor' in relation to the personal information that we collect about you.

### 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:

- 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;
- Enter a competition, promotion or survey;
- Give us some feedback

### What Data We Gather

We may collect the following information:

- Name
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Billing details
- Website usage data
- Other information relevant to client enquiries
- Other information pertaining to special offers and surveys

We may from time to time require sensitive personal information (such as medical information) to provide specific services to you safely or to comply with our legal obligations, where this is the case we will always inform you (and where required) ask for your explicit consent to record this information at the time.

For the purpose of security and health & safety CCTV and Incident monitoring take place on our site. Please be aware that images of you and information about incidents involving you will only be stored and processed as is required by law.

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 (01465 891233), email to [info@bennaneshore.com](mailto:info@bennaneshore.com) or by post to Data Protection Manager, Bennane Shore Holiday Park, Lendalfoot, Girvan, KA26 0JG.

### How we use your data

Under data protection law, we can only use your personal information if we have a proper reason for doing so. In order to use your personal information, we rely on the following legal bases:

- You have given consent to the processing of your data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which we are subject;
- Processing is necessary in order to protect your vital interests, or the vital interests of another individual;
- Processing is necessary for the purpose of the legitimate business purposes pursued by us:
  - o Directly marketing to you as an existing customer, managing and fulfilling customer requests

We may use your information to:

- Process bookings (and any specific requests) you have made
- Register you as a holiday home owner
- Carry out our obligations arising from any contracts entered into by you and us;
- Carry out our legal obligations arising from Health & Safety and security monitoring;
- Seek your views or comments on the services we provide;
- Notify you of changes to our services;
- Send you communications which you have requested or that we think may be of interest to you
- We may from time to time require sensitive personal information (such as medical information) to provide specific services to you safely or to comply with our legal obligations, where this is the case we will always inform you (and where required) ask for your explicit consent to record this information at the time.

If you do not provide the personal information we ask for, it may delay or prevent us from providing the services you have requested to you.

## 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 Protection Manager at Bennane Shore Holiday Park, Lendalfoot, Girvan, KA26 0JG.

## 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 computer's hard drive they should take the necessary steps within their web browsers security settings to block all cookies from our website.

## Visitors to our website

If we want to collect personally identifiable information through our website, we will be up front about this.

When someone visits our website, we may use a third-party service to collect 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.

## 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 and sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us through primary communications 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 or request to share a web page respectively through your social media platform account.

## Who has access to your information?

We routinely share your personal information with:

**Third Party Service Providers working on our behalf:** we may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of providing services to you on our behalf. However, when we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we ensure appropriate safeguards are in place that requires them to keep your information secure, in accordance with data protection laws, and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond our approved suppliers, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

**Third Party Data Processors working on our behalf:** we use software providers to process your personal information on our behalf. When we use third-party service providers, we disclose only the personal information that is necessary to deliver the service and we ensure appropriate safeguards are in place that requires them to keep information secure, in accordance with the data protection laws. Where we use a third party data processing we will ensure they uphold the same level of confidentiality and security that we maintain when handling your information, in accordance with data protection laws.

**Law enforcement/Regulatory Bodies:** we may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

**Professional advisors inc lawyers, bankers, auditors and insurers:** we may disclose and exchange information with our professional advisers to comply with our legal obligations.

## 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.

## 16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, we will require your parent/guardian's permission beforehand whenever you provide us with personal information.

## How long will your personal information be kept?

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 retention periods for different aspects of your personal data by contacting our DPM.

In some cases, 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. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## 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.
- **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.