



## **PRIVACY POLICY**

**Effective date 1st August 2023**

### **INTRODUCTION**

Welcome to our privacy notice.

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. 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**

The company is Cofton Country Holidays Limited, a company registered in England and Wales. Our company registered number is 5057836 and our registered address is Cofton Holidays, Starcross, Exeter EX6 8RP.

Email: [info@coftonholidays.co.uk](mailto:info@coftonholidays.co.uk)

Our nominated Data Controller is Helen Scott, Director.

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 last updated on 1st August 2023 and 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.

### **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.

We may also receive personal data about you from third parties and public sources, including other customers when they interact with us this includes and is not limited to, information received from credit agencies, and guest data when checking in.

## 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.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you with our business	Performance of a contract with you
To perform any contract with you 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)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Notifying you about changes to our business which are relevant to you	(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 and to study how people use our business)

<p>To administer and protect our business and our website (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>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>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>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 use data analytics to improve our website, products/services, marketing, relationships and experiences</p>	<p>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 not opted out of receiving that marketing.

## OTHER MARKETING

We will get your express opt-in consent before we use your personal data for any other marketing purpose or share it with any third party for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at [info@coftonholidays.co.uk](mailto:info@coftonholidays.co.uk)

## **COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

## **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.

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 anyone. We may record your session using Hotjar analytics; no personal information such as payment details, email address, address, or name will be displayed or recorded.

## **TELEPHONE CALLS**

Please note that calls to and from Cofton Holidays and all individual departments, including Reception, Bars, Housekeeping, Leisure and Fitness and the central switchboard may be monitored and recorded. The purpose of which is for training, quality and content clarification.

## **PHOTOGRAPHY**

Please be advised that promotional photographs and videos may be taken around our park including during entertainment and activities/events.

They are for use on our website, social media, in the press and for marketing materials.

By entering our parks and venues, you consent to Cofton Holidays photographing and using your image and likeness.

## **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 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:

Name	Lawful basis for processing including basis of legitimate interest
Service providers for IT and system administration	<p>Performance of a contract with you such as booking a holiday and processing your payment.</p> <p>To assist us in the improvement and optimisation of our site and to make suggestions about similar goods and services that may be of interest to you.</p> <p>Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice).</p>
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 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 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**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **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 us at [info@coftonholidays.co.uk](mailto:info@coftonholidays.co.uk)

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, for any promotional or marketing purposes.

**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.

## **APP PRIVACY POLICY**

Cofton Holidays built the Cofton Holidays app as a Free app. This service is provided by Cofton Holidays at no cost and is intended for use as is.

This page is used to inform app users regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service.

If you choose to use our Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

### **Information Collection and Use**

For a better experience, while using our Service, we may require you to provide us with certain personally identifiable information.

### **Booking Login**

When using the app you have the ability to login with an existing username and password created when making a booking with us. Our app communicates with the third party booking system and then stores small amount of information to help personalise the app experience to your booked holiday.

- The app or connected web service does not store your username and password in any form
- Future requests to refresh booking and balance information uses a tokenised identifier provided by the booking engine
- This data is completely cleared when you use the logout feature found in the app
- This data is completely cleared when you use the clear data feature found in the app

### **Push Notifications**

The app can receive push notifications. You can choose to receive notifications based on their interest/booking type, and disable them if you wish.

- Notifications can be disabled when logging into the app for the first time
- Notifications can be disabled at anytime by navigating to the settings section of the app
- Notifications can be disabled at anytime outside of our app using your devices operating system

### **Analytics**

The app uses analytics from Google Firebase. This is so we can improve the app by seeing which areas are used, and for what purpose.

- We do not report on any sensitive or identifiable information in regards to your booking or user
- Analytics can be disabled at anytime by navigating to the settings section of the app

### **Third Parties**

The app does use third party services that may collect information used to identify you.

Link to privacy policy of third party service providers used by the app

- Google Play Services
- Google Analytics for Firebase