

## PRIVACY POLICY

St Anthony Holiday Cottages provides goods and services to customers from the premises at St Anthony, Helston, Cornwall, TR12 6JW. The Company is committed to protecting the privacy and security of your personal data. This Privacy Policy will explain how the company holds and processes the personal data we collect from you.

### What data do we collect?

St Anthony Holiday Cottages collects the following data:

- Personal identification information i.e. name, email address, telephone numbers, address, bank details
- Data is also held of contractors, retailers, service providers and manufacturers that supply St Anthony Holiday Cottages with goods or services for the purposes of payment of invoices relating to purchases.

Customer Data held for these purposes is processed under the lawful basis of Contract as set out in the General Data Protection Regulations.

### How do we collect your data?

You directly provide St Anthony Holiday Cottages with most of the data we collect. We collect and process data when you:

- Voluntarily subscribe to our St Anthony Newsletter through our website. Data held for this purpose is processed under the lawful basis of Consent as set out in the General Data Protection Regulations.
- Make a booking on our website. Customer Data held for these purposes is processed under the lawful basis of Contract as set out in the General Data Protection Regulations.
- Use the contact form on our website. Data held for this purpose is processed under the lawful basis of Consent as set out in the General Data Protection Regulations.
- Use or view our website via your browser's cookies (see our Cookie Policy).

### How will we use your data?

St Anthony Holiday Cottages collects your data so that we can:

- Process your booking
- Send you relevant information regarding your booking
- Manage your account
- Send our St Anthony Newsletter to you via email
- Send invoices

**Services** In order to provide certain services, and subject to your consent, St Anthony Holiday Cottages will share your data (as appropriate) with the following:

- Property owners - We will share your personal data with property owners who have a need to know for the purpose of the booking. If you provide feedback on a property, we may also share this with the owner of the property which may include disclosing your personal data.
- Couriers - in the instance of returning personal property we will need to supply a courier with your name and postal address

**Feedback** We may contact customers from time to time to seek information and feedback relating to our performance in order to assist us in improving services. Customer Data used for this purpose is processed under the lawful basis of Legitimate Interests as set out in the General Data Protection Regulations. We use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

**Marketing** St Anthony Holiday Cottages would like to send you information that we believe may be of interest or benefit to you. This can include newsletters and special offers. Customers or individuals who subscribe to either of these have requested to receive our newsletters by email and the information is not used for anything other than this purpose. Customers have the option to unsubscribe from this service at any time. Please note that such information or offers will come directly from and relate solely to St Anthony Holiday Cottages and never from a third party. Where this data is processed for email distribution, customer's email address may be uploaded to a bona fide third-party email distribution service (currently Mail Chimp) and customer's data is held and processed by them solely for email delivery purposes.

**Google Analytics** We collect personal data to power our site analytics (Google Analytics), including:

- Information about your browser, network, and device
- Web pages you visited prior to coming to this website
- Your IP address

This information may also include details about your use of our website, including:

- Clicks
- Internal links
- Pages visited
- Scrolling

- Searches
- Timestamps

We share this information with Google, our website analytics provider, to learn about site traffic and activity and to improve our website. This analytics software gives us insight about our visitors only in general, but not about individuals by itself, as it does not track visitors and does not store any personal identifiable information. Data used for this purpose is processed under the lawful basis of Legitimate Interests.

**Legal Disputes** Data may also be passed to third parties in the event of a legal dispute or for debt recovery purposes where there is a legitimate business reason for us to do so. Data held for this purpose is processed under the lawful basis of Legal Obligation as set out in the General Data Protection Regulations.

**Track & Trace** It is now a legal requirement for St Anthony Holiday Cottages to collect customer/visitor and staff contact details for contact tracing purposes. The data required includes name and contact telephone number of at least the 'lead' party member, together with the dates the party will be on-site. Data held for this purpose is processed under the lawful basis of Legal Obligation as set out in the General Data Protection Regulations. We will retain this information for 21 days. Once that period is up, we will dispose of the information securely i.e. shredding paper records or permanently deleting digital files. This data will only be shared when it is requested by a legitimate public health authority.

### **How do we store your data?**

Electronic Data is held by St Anthony Holiday Cottages securely on servers protected by appropriate firewall and anti-virus measures and backed up regularly.

Paper Data is held and used on the premises and stored in locked filing cabinets within a secure office when unoccupied. When data is no longer required, we ensure these records are destroyed with no trace.

### **Third party sites**

Our websites contain links to other websites operated by third parties. Please note that this privacy policy applies only to the personal data that we collect through our sites or services, and we cannot be responsible for personal data that third parties may collect, store and use through their website. You should always read the privacy policy of each website you visit carefully.

### **What are your data protection rights?**

St Anthony Holiday Cottages would like to make sure you are fully aware of your data protection rights. Every customer is entitled to the following:

- **The right to access** – You have the right to request St Anthony Holiday Cottages for copies of your personal data.
- **The right to rectification** – You have the right to request that St Anthony Holiday Cottages correct any information you believe to be inaccurate. You also have the right to request St Anthony Holiday Cottages to complete information you believe is incomplete.
- **The right to erasure** – You have the right to request that St Anthony Holiday Cottages erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that St Anthony Holiday Cottages restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** – You have the right to object to St Anthony Holiday Cottages' processing of your data, under certain conditions.
- **The right to data portability** – You have the right to request that St Anthony Holiday Cottages transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

St Anthony Holiday Cottages recognise that customers have rights to their personal data and take the protection of these rights seriously. As a result, we only ever use customer data for the purposes outlined in this privacy notice.

Should you wish to discuss any aspect of St Anthony Holiday Cottages' Privacy Policy, our use of your data or if you have a question, objection or complaint about anything relating to the use of your data, please contact the Boathouse Office on 01326 231357 or email [info@stanthony.co.uk](mailto:info@stanthony.co.uk).

Please note that the information in this notice may be amended from time to time to ensure complete compliance with the relevant regulations or to provide additional information as to how we store and process our customer's personal data.

Last updated: 19<sup>th</sup> March 2021