
PRIVACY NOTICE

BACKGROUND:

Water's Edge Leisure Park understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our private owners, visitors, guests, customers and employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Water's Edge Leisure Park Ltd is a Limited Company registered in England & Wales under company number 12272381

Registered address: C/O Saundersfoot Bay Leisure Park, Broadfield Hill, Saundersfoot, Pembrokeshire SA69 9DG

Main trading address: Patch Caravan Park, Gwbert-On-Sea, Cardigan, Ceredigion SA43 1PP

Alternative trading address: N/A

VAT number: 339781459

Data Protection Manager: Rachael Polydorou, General Manager

Email address: info@watersedgeleisuerpark.co.uk

Telephone number: 01239 615858

Postal Address: Water's Edge Leisure Park, Patch Caravan Park, Gwbert-On-Sea, Cardigan, Ceredigion SA43 1PP

We are a member of The Federation of Small Businesses.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in

Part 11.

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have that is not related to your pitch or account. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect and how do you collect it?**

We may collect and use various types of personal information about visitors to our websites, guests who book a holiday with us and our holiday homeowners. Details of this information are set out below: (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Marital Status;
- Address;
- Geographical location;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Caravan home ownership & previous part exchange details;
- Where there are additional members of your party, we will ask for the name and age (relevant to Saltern Caravan Park only);

- Payment information & account number;
- Identification such as passport/driving licence for financing arrangements;
- Information about your preferences and interests;

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;
- complete a booking form and/or complete a customer enquiry form for pitch availability;
- 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 other publicly accessible sources including (but not limited to) the electoral register, credit reference agencies, business directories, media publications and social media.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you with our business	Performance of a contract with you
Brochures and park information	We may call you to see if you have received information that you requested on completing an initial customer enquiry form.
Park availability in the area	With your consent we will contact you about available pitches in our catchment area.
Additional party members	We may ask for additional information so we can manage your booking effectively (Saltern Caravan Park Only).
Communicating with you	This may include responding to emails, social media, web chat or calls from you.

<p>To perform any contract and manage your account including:</p> <p>(a) Managing payments, fees and charges</p> <p>(b) Collecting and recovering money owed to us</p> <p>(c) Addressing any breach</p>	<p>(a) Performance of a contract with you (i.e. annual licence agreement completion)</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>(c) Necessary for our legitimate interests (to ensure compliance with contract terms)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) 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>Duty of care</p>	<p>To carry out warranty and maintenance visits, we will retain your product information and destination in accordance with our legal obligations.</p> <p>If you wish to change your consent on any warranty or maintenance reminders, email: optout@watersedgeleisurepark.co.uk</p>
<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>Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing: optout@watersedgeleisurepark.co.uk)</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>You may unsubscribe or opt-out at any time by emailing: optout@watersedgeleisurepark.co.uk</p>

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how people use our business, to develop and grow our business and to inform our marketing strategy)
Communicating with our business advisors and legal representatives	This is necessary for our legitimate interests of obtaining legal or professional business advice, we will only share your personal information where it is necessary to do so, and on an anonymised basis wherever possible.
Health & Safety	If you are involved in a reportable accident or incident while you are with us, we will record your details and the incident details in our accident book. The legal basis for our use of this information is our legitimate interests in managing our business and developing our services.
CCTV	To protect our guests and premises from crime, we operate CCTV which record images for security.

Marketing:

We may collect details of your marketing preferences and whether or not you want to receive certain marketing messages (e.g. marketing e-mails or direct marketing via post) from us.

We combine this with your personal information detailed in 5 & 6 above and we use this information for the following purposes:

a) Providing you with marketing information about our services that we feel may interest you if you have agreed to receive these (you can unsubscribe at any time using links provided in our e-mails or through the return address provided). Email marketing information may also be provided through advertising on websites.

b) Providing information about changes to our services.

Where you have booked or received a quotation for a holiday with us, received a quotation for a holiday home purchase with us or own a holiday home with us.

The legal basis for our use of this information is our legitimate interests in promoting and selling our services. You have the right to object to us processing this data at any time and our right to process data is not overridden by your interests, fundamental rights and freedoms.

If you have not booked or received a quotation for a holiday or holiday home purchase with us, the legal basis for our use of this information is your consent. You have the right to withdraw your consent at any time

c) We may collect certain other information that you give us, for example, if you take part in discussion boards or other social media functions on our website, participate in a web chat, register with us for and/or enter into competitions or promotions, complete surveys, or report problems with our website.

If you wish to amend your consent on receiving general marketing at any point email optout@watersedgeleisurepark.co.uk

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the

reason(s) for which it was first collected. Your personal data will therefore be kept taking into account the following:

- the purpose for which we are processing your personal information, such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or for our legitimate interests;
- whether we have any legal obligation to continue to process your information, such as any record keeping obligations imposed by applicable law (HMRC VAT retention is six years for example) and;
- whether we have any legal basis to continue to process your personal information, such as your consent.
- 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.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

9. **Do You Share My Personal Data?**

We do not share website visitor and guest personal information with third parties for the purposes of the third party sending you marketing information.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority, please see table below:

Name	Lawful basis for processing including basis of legitimate interest
Legal Proceedings	Where we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
Other companies in our group	Performance of a contract with you Necessary for our legitimate interests (performing the contract).
Suppliers & Manufacturers	We share information such as name and destination, with our manufacturers in line with our retailer agreements and with respect to safety and compliance specifications, so they can carry out warranty and maintenance to fulfil legal obligations. If you wish to obtain a list of these manufactures please contact the Data Controller.

Caravan Parks	New customers - Where you have given us consent to supply your details to potential parks that you would like us to supply a future holiday home. Existing customers – performance of a contract with you when your holiday home is based at land owned by another supplier.
Transport companies	Performance of a contract with you, where supplying a holiday home to a private residential address we will need to supply Name, Address and contact number.
Finance Providers (Lenders & Banks)	We may forward your details to a limited number of lenders for finance purposes on your request.
Service providers for IT and system administration	Performance of a contract with you Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice).
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.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

We do not share website visitor and private owner personal information with third parties for the purposes of the third party sending you marketing information.

Our Website may contain links to and from the websites of our partner networks, lenders and manufacturers.

In the event of you following these links, these websites will have their own privacy policies and Broughton Leisure Ltd does not accept any responsibility or liability for these policies.

We would advise that you check these policies before you submit any personal information to these websites.

10. **How Can I Access My Personal Data?**

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.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Rachael Polydorou, General Manager):

Email address: rachael@broughtonleisure.co.uk

Telephone number: 01239 615858

Postal Address: Water's Edge Leisure Park, Patch Caravan Park, Gwbert-On-Sea, Cardigan, Ceredigion, SA43 1PP

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website and the dates of all amendments will be shown at the top of the page so you can see if any adjustments have been made since you last viewed the page.