

## PRIVACY POLICY – DRUMMOHR HOLIDAY PARK

1<sup>st</sup> March 2021

Date of next review 1<sup>st</sup> March 2022

WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN (trading as Drummohr Holiday Park) ("**We**", "**the Company**", "**Drummohr**") are committed to protecting and respecting the confidentiality, integrity and security of the personal information we hold about each past or present guest, customer, enquirer, prospect or visitor to our website ("**you**", "**your**").

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and how we comply with our responsibilities under applicable data protection laws ("**Data Protection Laws**"). Please read this policy carefully and if you have any questions or concerns please contact us using the information below.

### **Data Controller**

For the purposes of the Data Protection Laws, the data controller of your personal information is WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN.

### **Personal data collection**

We only hold personal data about you which you have provided to us or to one of our authorised data processors or has been collected via social media metadata.

### **Categories of personal data we may collect and hold**

We may collect the following information from you:

- name, address and contact details including email address and telephone numbers;
- vehicle registration numbers;
- dates of birth, including for children;
- any known disabilities or access requirements;
- members of your party and/or pitch preferences, including other guests you want to be located next to;
- details of your current and previous stays with us;
- CCTV images;
- credit card or bank details if applicable;
- social media metadata; and
- feedback and testimonials about your stay, including photos

### **Purposes for which your personal data is used**

We will use the personal data which you provide to us for the following purposes:

- allowing WCF Ltd to administer your holiday booking requests;
- providing you with information about your stay and responding to your queries;
- ensuring that we provide you with facilities that are suitable for your needs;
- taking payments in relation to your booking and stay with us;
- seeking feedback from you in relation to your stay and using your reviews and testimonials on our websites and in our promotional literature;
- encouraging repeat bookings by supplying you with special offers or information about our events;
- sending out email newsletters;
- preventing fraud and enhancing the security of our networks;
- protecting our property and the safety of all our guests by ensuring that we can identify everyone on site;
- understanding how our guests interact with our websites and personalising their repeat visits;
- determining the effectiveness of our promotional campaigns and advertising;
- responding to queries and complaints; and
- fulfilling our legal and fiduciary responsibilities.

### **Legal basis for Processing**

In processing customer data WCF relies on the following legal bases:

- Where it is necessary for the performance of our contract with you;
- Where it is necessary for compliance with our legal obligations;
- Where it is necessary for the purposes of WCF's legitimate business interests, which include maintaining direct, relevant and appropriate contact with our customers to enable us to give them the best and relevant service and products; and in some cases

Where the data subject has given their consent for the processing of their personal data. Any information which you provide to us in relation to your health, disabilities or access requirements will constitute "special category" personal data and you will be asked to consent to our processing of such data by us in accordance with the purposes set out in this policy at the time that such information is provided or when your booking is made.

We may process customer data on more than one legal basis. Please contact us if you need details as to which legal ground we are relying on to process any specific item of personal data.

Where we rely on consent to send marketing communications, you have the right to withdraw your consent at any time by contacting our Site Manager on 0131 665 6867 or via email at [admin@drummohr.org](mailto:admin@drummohr.org).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

### **Disclosure of your personal data**

We will not disclose personal information we hold about you to any third party except as set out below.

We may disclose personal data to third parties who are providing services to us, in particular to the IT companies that support our booking, ecommerce and e-mail newsletter systems, Vacation Rentals T/A (Hoseasons) Ltd, PitchUp.com Ltd, RMS Europe Ltd, to the mailing houses and postal services that distribute our marketing literature and to payment processors for the purposes of booking payments and refunds.

We may also disclose personal data we hold to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold to the prospective buyer of such business or assets; and/or
- (b) if we are permitted by law to disclose your personal data to that third party or are under a legal obligation to disclose your personal data to that third party.

### **Updating your marketing preferences**

We have no desire to contact those customers, prospects or enquirers who do not wish to receive marketing correspondence from us. However, where you have enquired about booking a holiday or have booked a holiday, we have a legitimate business objective in marketing to you to encourage new or repeat purchases. We will do so in compliance with Data Protection Laws. In accordance with your marketing preferences, we may use your personal data to send you newsletters and other marketing communications. We may also collect information about how you interact with our marketing communications (for example, whether you open emails we send to you). This helps us make our marketing more relevant to you.

If you wish to change your marketing preferences, there are various ways in which you can do this:

- by telephone to our Site Manager on 0131 665 6867;

- in writing to Drummohr Holiday Park, Levenhall, Musselburgh, Edinburgh, East Lothian, EH21 8JS;
- by email at [admin@drummohr.org](mailto:admin@drummohr.org); or
- unsubscribe from marketing email communications by following the unsubscribe instructions in each email that we send out.

Please note that you may continue to receive marketing communications for a short period after changing your preferences while our systems are updated.

### **Access and other rights**

You may request to see the personal information we hold about you either digitally or on file at any point by making a request in writing to us via The Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or via email on [pam.murray@wcf.co.uk](mailto:pam.murray@wcf.co.uk). This request will be responded to within 30 working days. You will be provided with a copy of the personal information we hold about you. If we require more time to respond fully to any request, we will notify you in writing within the 30-day period referred to. Any additional copies of any information we provide to you may be subject to a reasonable fee.

You also have other rights under Data Protection Laws in relation to your personal data. In particular, you may have (i) the right to request that we rectify or erase information we hold about you in certain circumstances, (ii) the right to ask us to limit our processing of your information, (iii) the right (if we are processing information based on your consent, such as for marketing purposes) to withdraw your consent, (iv) the right to object to certain processing of your information (including the right to object to processing of your personal data for direct marketing purposes at any time), (v) the right to ask us to move, copy or transfer your personal information to another organisation.

If you wish to exercise any of these rights, please contact us via the Company Secretary at Crawhall, Brampton, Cumbria, CA8 1TN or via email on [pam.murray@wcf.co.uk](mailto:pam.murray@wcf.co.uk).

### **Accuracy of personal data**

We try to ensure that the information we hold about you is accurate and kept up-to-date and may ask you to re-confirm certain information when processing your booking. However, if at any time you believe that any information we are holding about you is inaccurate, out-of-date or incomplete, please notify us in writing via Drummohr Holiday Park, Levenhall, Musselburgh, Edinburgh, East Lothian, EH21 8JS, by calling 0131 665 6867 or via email at [admin@drummohr.org](mailto:admin@drummohr.org) as soon as possible. We will promptly correct or delete any information found to be incorrect.

### **Security**

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of the personal data we hold about you, and against the accidental loss of, or damage to, such personal data.

## **Transferring personal data outside the UK**

Except if appropriate safeguards are in place, we will not transfer any data to a country outside of the UK or to a person based outside the UK. Such safeguards may include: only transferring personal data to countries that have been deemed to provide an adequate level of protection for personal data; or where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection as it has in the UK. .

## **Retention of data**

We are committed to ensuring that we do not retain personal data for any longer than is necessary for the purposes for which it was obtained. In the majority of cases, all personal data about you will be deleted 6 years after the date of your last stay or enquiry.

You can update your marketing preferences at any time by using one of the methods outlined above.

## **Third Party Links**

This 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.

## **Changes to this policy**

We may make changes to this Privacy Policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer to this page regularly to see any changes or updates to this policy.

## **Contact**

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal data has been handled, please do so in writing and address this to the Company Secretary, WCF Ltd, Crawhall, Brampton, Cumbria, CA8 1TN or via email on [pam.murray@wcf.co.uk](mailto:pam.murray@wcf.co.uk).

## **Complaints**

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection Laws you have the right to lodge a complaint at the Information Commissioner's Office (<https://ico.org.uk/>).