

1. THIS POLICY

- 1.1. This policy is issued by Pebblebed Cottages, identified as controllers ("us", "we", or "our"), and is addressed to individuals outside of our organisation with whom we interact, including visitors to our websites, customers, personnel of our customers and vendors (you).
- 1.2. This Policy may be amended or updated from time to time to reflect change in our practices with respect to the processing of Personal Data, or changed to applicable law or regulation. We encourage you to read this policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this policy.

2. PROCESSING YOUR PERSONAL DATA

- 2.1. **Collection of personal Data:** We collect personal about you from a variety of sources as follows:
 - (a) When you provide it to us (for example, where you contact us via email or telephone, online enquiry, or by any other means;
 - (b) In the ordinary course of our relationship with you (for example, in course of managing your transactions or during the on-boarding process);
 - (c) That you choose to make public, including via social media (for example, we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible.
 - (d) From third parties who provide it to us (for example your employer; our customers; credit reference agencies; and law enforcement and regulatory authorities);
 - (e) From third parties who provide it to us (for example our suppliers; personal recommendations; where you purchase any of our products or services through such third parties);
 - (f) When you visit any of our sites or use any feature or resources available on or through a site. When you visit a site, your device and browser may automatically disclose certain information (such as device type, operating system, browsers type, browser settings, IP address, language settings, dates and times of connections to a site and other technical communication information), some of which may constitute personal data.
- 2.2. **Creation of personal Data:** We create personal data about you, such as records of your intentions with us, and details of your accounts, subject to applicable law and regulation.
- 2.3. **Relevant Personal and Sensitive Personal Date:** The categories of personal Data about you that we may process, subject to applicable laws are as follows:
 - (a) Personal details: given name(s); preferred name(s); nickname(s);
 - (b) Contact details: address; telephone number(s); email address and social media profile details;
 - (c) Financial details: billing address;
 - (d) Views and opinions; any views and opinions that you choose to send us, or publish about us (including on social media platforms); and

- (e) Electronic Identifying Data: IP addresses; cookies, activity logs, online identifiers, unique device identifiers and geolocation data.

2.4. **Processing your Sensitive Personal Data:** We do not seek to collect or otherwise process your sensitive personal data.

- (a) The Processing is necessary for compliance with a legal obligation (for example, to comply with any relevant diversity reporting obligations);
- (b) The Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law and regulation;
- (c) You have manifestly made those Sensitive Personal Data public;
- (d) The Processing is necessary for the establishment, exercise or defence of legal rights;
- (e) We have, in accordance with applicable law, obtained your explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is voluntary- it is not used for Processing that is necessary or obligatory in any way); or
- (f) Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

2.5. **Purposes for which we may process your personal Data:** The purposes for which we may process Personal Data, subject to applicable law are:

- (a) Provision of products and services to you: administering relationships and related services; performance of tasks necessary for the provision of the requested services: communicating with you in relation to those services;
- (b) Marketing / Prospecting. Communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law: and maintaining and updating your contact information where appropriate;
- (c) Operation of our Sites: operation and management of our Sites; providing content to you: displaying advertising and other information to you: and communicating and interacting with you via our Sites.
- (d) IT operations: management of our communications systems, operation of IT security/IT security audits;
- (e) Health and safety: health and safety assessments and record keeping: and compliance with related legal obligations;
- (f) Financial management sales: finance; corporate audit; and vendor management;
- (g) Research, conducting market or customer satisfaction research: and engaging with you for the purposes of obtaining your views on our products and services;
- (h) Security: physical security of our premises and electronic security;
- (i) Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law;
- (j) Legal compliance: compliance with our legal and regulatory obligations under applicable law;
- (k) Legal proceedings: establishing, exercising and defending legal rights;
- (l) Improving our products and services: identifying issues with existing products and services: planning improvements to existing products and services; and creating new products and services; and / or
- (m) Risk Management Audit: compliance, controls and other risk management.

- 2.6. **The legal basis on which we perform Processing of your Personal Data:** The legal basis on which we may process Personal Data, subject to applicable law are:
- (a) The processing is necessary in connection with any contract that you may enter into with us, or which we are required to take prior to entering into a contract with you;
 - (b) We have a legitimate interest in carrying out the processing for the purpose of improving our products or services (to extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms); and/or
 - (c) We have obtained your prior content to the processing (this legal basis is only used in relation to processing that is entirely voluntary, it is not used for Processing that is necessary or obligatory in any way).

3. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 3.1. We may disclose your Personal Data for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law. In addition, we may disclose your Personal Data to:
- (a) You and where appropriate, your family, your associates and your representatives;
 - (b) Clients and customers of our businesses;
 - (c) Credit reference agencies;
 - (d) Anti-fraud services;
 - (e) Governmental, legal, regulatory, or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation;
 - (f) Accountants, auditors, financial advisors, lawyers and other outside professional advisors to the Group, subject to binding contractual obligations of confidentiality;
 - (g) Debt-collection agencies and tracing agencies;
 - (h) Data aggregation services;
 - (i) Accreditation bodies;
 - (j) Third party Processors (such as payment services providers; shipping companies; etc. Subject to the requirements);
 - (k) Any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law;
 - (l) Any relevant party for the purposes of prevention. Investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;
 - (m) Any relevant third-party acquirer(s) if we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).
- 3.2. Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

3.3. If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to:

- (a) Only Process the Personal Data in accordance with our prior written instructions; and
- (b) Use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

4. DATA SECURITY

4.1. We have implemented appropriate technical and organisation security measures designed to protect your personal data against accidental or unlawful destruction, loss, alternation, unauthorised disclosure, unauthorised access and other unlawful or unauthorised forms of processing, in accordance with applicable law and regulation.

4.2. You are responsible for ensuring that any personal data that you send to us is sent securely.

5. DATA ACCURACY

5.1. We take reasonable steps designed to ensure that:

- (a) Your personal data that we process is accurate and, where necessary, kept up to date; and
- (b) Any of your Personal Data that we process that is inaccurate (having regard to the purposes for which they are processed) is erased or rectified without delay.

5.2. From time to time we may ask you to confirm the accuracy of your personal data.

6. DATA MINIMISATION

We take reasonable steps designed to ensure that Personal Data is only processed for the minimum period necessary for the purpose set out in this policy.

7. DATA RETENTION

7.1. We take reasonable steps designed to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Policy. The criteria for determining the duration for which we will retain your Personal Data is as follows:

- (a) We will retain copies of your Personal Data in a form that permits identification only for as long as:
 - i. We maintain an ongoing relationship with you (for example, where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or
 - ii. Your Personal Data is necessary in connection with the lawful purposes set out in this Policy, for which we have a valid legal basis (for example, where your Personal Data is included in a contract between you and us, and we have a legitimate interest in processing the data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal or regulatory obligation to retain your Personal Data); and

- (b) The duration of:
 - i. Any applicable limitation period under applicable law or regulation (for example, any period during which any person could bring a legal claim in connection with your Personal Data, or to which your Personal Data may be relevant); and
 - ii. An additional three (3) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim); and
- (c) If any relevant legal claims or regulatory investigations are applicable to your Personal Data, the Group may continue to Process your Personal Data for such additional periods as are necessary in connection with such claim or investigation.

7.2. During the periods noted in paragraphs (b)(i) and (b)(ii) above, we will restrict its Processing of your Personal Data to storage of, and maintaining the security of the data, except to the extent that the data needs to be reviewed in connection with any legal claim, or any obligation under applicable law or regulation.

7.3. Once the periods in paragraphs (a) - (c) above, each to the extent applicable, have concluded, we will either:

- (a) Permanently delete or destroy the relevant Personal Data;
- (b) Archive your Personal Data so that it is beyond use; or
- (c) Anonymise the relevant Personal Data.

7.4. Telephone Measurement

We may, in some instances, use measurement numbers on our Site. This is solely to understand the performance of the Site. This data is only recorded when you voluntarily choose to call the telephone number listed on our Site. The data that we record is the time, date, duration of the phone call and the telephone number that called our business. The actual phone call conversation is not recorded. The data recorded is logged within a password protected area that also includes an SSL Certificate (Secure Sockets Layer).

7.5. Information our Site collects automatically Log Data and Google Analytics

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). We use third-party services such as Google Analytics and AW Stats, to collect standard internet log information and details of visitor behaviour patterns. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. Other than the above, at this time, we do not attempt to identify visitors to our Site or contact them using this data. We have no plans to do so in the foreseeable future. You will be kept informed of any change to this situation.

7.6. User and Event Data Retention within Google Analytics

Google Analytics will retain data for a given timescale before automatically deleting it. These timescales can vary between 14 months, 26 months, 38 months, 50 months or can be set to never automatically expire. The data retention period is automatically set as 26 months, unless otherwise specified. When data reaches the end of the retention period specified, it is deleted automatically on a monthly basis. We may or may not set retention periods so that they can be reset on new activity. This means that the data retention period would be reset from the date of re-entry as a User to the Site. If you, as the User, do not initiate a new session before the retention period expires, then your data will be deleted.

8. YOUR LEGAL RIGHTS:

- 8.1. Subject to applicable law, you have a number of rights regarding the processing of your Personal Data, including:
- (a) The right to request access to, or copies of, your Personal Data that we Process or control, together with information regarding the nature, processing and disclosure of those Personal Data;
 - (b) The right to request rectification of any inaccuracies in your Personal Data that we Process or control;
 - (c) The right to request, on legitimate grounds:
 - i. Erasure of your Personal Data that we Process or control; or
 - ii. Restriction of Processing of your Personal Data that we Process or control;
 - (d) The right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;
 - (e) Where we Process your Personal Data with your consent, the right to withdraw that consent;
 - (f) The right to lodge complaints with a Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf.
- 8.2. This Policy does not affect your statutory rights.
- 8.3. Subject to applicable law, you may also have the following additional rights regarding the Processing of your Personal Data:
- (a) The right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf; and
 - (b) The right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.
- 8.4. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or our Processing of your Personal Data, please use the contact details provided in Section 11 below.

9. **COOKIES:** A cookie is a small file that is placed on your device when you visit a website (including our Sites) which records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our Cookie Policy.

10. DIRECT MARKETING

- 10.1. We may Process your Personal Data to contact you, primarily by mail and email and on occasion by telephone, so that we can provide you with information concerning products and services that may be of interest, provided that we have first obtained your consent, to the extent required by, and in accordance with, applicable law and regulation.
- 10.2. If you do not wish to receive marketing communications from us you can opt out at any time by contacting your usual contact. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

11. CONTACT DETAILS

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by us, please contact your regular contact or sarah@pebblebedcottages.co.uk