

## **Privacy Policy**

St. Tinney Farm Holidays – PRIVACY NOTICE

### INTRODUCTION

This privacy notice applies to all products, services and websites provided by the St. Tinney Farm Holidays and is meant to help you understand what data we collect, and what we do with it.

We 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.

### WHO WE ARE

Data Controller (referred to as “we/us/our”)

St. Tinney Farm Holidays  
Otterham  
Cornwall  
PL32 9TA

Title of Data Protection Manager:  
Operations Manager  
Address: St. Tinney Farm Holidays  
Otterham  
Cornwall  
PL32 9TA  
Telephone: 01840 298274  
Email: [info@st-tinney.uk](mailto:info@st-tinney.uk)

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

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

Personal data are defined as any information relating to a living individual from which he or she can be identified, such as a person’s name, address or date of birth.

The personal data that we collect consists mainly of customers' names, addresses and contact details and any other information necessary for us to be of service to our customers, including the necessary financial information required to maintain payments and provide the services that they require.

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:

apply for holiday information or about lodge purchase

contact us to access a service

respond to our data checks

complete an enquiry form.

We may also receive personal data about you from third parties and public sources when they interact with us and (if applicable):

Who

When

Members of the public

making a complaint

Companies House

for example, when vetting a ownership applications

Other publicly available sources, such as media reports

#### PEOPLE WHO MAKE A COMPLAINT

When we receive a complaint we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint. For internal use only, we do compile statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

Only with the complainant's agreement will we disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for six years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues.

## 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.

Purpose/Activity

Lawful basis for processing including basis of legitimate interest

To register you with our business

Performance of a contract with you

To perform any contract with you including:

(a) Providing St. Tinney Farm related services

(b) Managing subscriptions, payments, fees and charges

(c) Collecting and recovering money owed to us

(d) Addressing any breach

(a and b) Performance of a contract with you

(c) Necessary for our legitimate interests (to recover debts due to us)

(d) Necessary for our legitimate interests (to ensure compliance with St. Tinney Farm Holidays standards and 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)

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

(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)

(b) Necessary to comply with a legal obligation

Asking you to complete a survey or feedback questionnaire

Necessary for our legitimate interests (to study how members use our services, to develop and improve our services to you)

To use data analytics to improve our website, products/services

Necessary for our legitimate interests (to keep our website updated and relevant and to develop our services)

To record all incoming and outgoing telephone calls

Necessary for our legitimate interests (to monitor and maintain service standards)

We need to obtain, store and use information about you for legitimate business purposes - namely so that you can enjoy and benefit from our services. We may use information we hold about you in the following ways:

to confirm your identity

to administer your holiday or letting accommodation

to let you know about other relevant services, both ours and those of other parties which may be of assistance to you

to update and correct our records

to carry out statistical and market analyses, including benchmarking exercises, to enable us to understand you better and improve our services

to develop, test and improve our systems

to notify you about changes to our services

to ensure the content of our website is presented in the most effective manner for you and for your computer

to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

to improve our website to ensure that content is presented in the most effective manner for you and for your computer

We may combine information we receive from other sources with information you give to us for the purposes set out above (depending on the types of information we receive).

An important part of our work is communicating with our customers, telling you about our activities and how we are supporting your interests, and seeking your views on current issues. To do so, we use personal information to keep in touch.

We will use the contact information you have given us to send you important information. This may be by post, email, text message or telephone.

We may also use the information we hold about you in order to provide you with information about other products or services we feel may interest you.

We believe that such communications are both in our legitimate interests, to raise awareness of our work and promote our services, and in your interests. However, you do have the right to ask us to stop sending you marketing communications. If you would like to stop receiving these, please email [info@st-tinney.co.uk](mailto:info@st-tinney.co.uk).

#### VISITORS TO THE ST. TINNEY FARM HOLIDAYS WEBSITE

We use Google Analytics to find out how people interact with our site.

Google Analytics stores information about what pages you have visited, how you arrived there and how long you spend on the site. Google Analytics does not collect or store any personal information used to identify who you are such as your name or address. We do not allow Google to use or share our analytics data. For more information about Google Analytics cookies go to [Google Privacy Policy](#).

Links to external sites from our websites contain links to other third party websites. These websites are not covered by this Privacy Policy and St. Tinney Farm Holidays is not responsible for the privacy practices within any of these other websites. You should be aware of this when you leave the websites and we encourage you to read the privacy statements of other websites.

#### COOKIES

For information about the cookies we use, and your ability to refuse them please refer to our separate cookie policy <https://www.st-tinney.co.uk/cookies-policy.php>

#### 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.

## 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

Personal information is held on our database and in back-up form. Hard copies of information on our database are occasionally made where necessary to provide our services. Photocopies may occasionally be made of manual records.

Access to our database is restricted through the use of passwords. Records may be retrieved, consulted, adapted, modified, copied or deleted from time to time. We will endeavour to take all reasonable steps to keep all data accurate and up to date but we rely upon our members to inform us of any material changes

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

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 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

We do not transfer your data outside the European Economic Area.

#### 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 monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the confines of the law.

Where we have given you 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 information 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.

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 our DPM.

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. 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.