

Privacy Policy

Introduction

Welcome to the privacy policy for Abbeyford Leisure.

Abbeyford Leisure respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in the following format in the specific areas set out below. You can also download a PDF version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

This privacy notice may be changed from time to time by updating this page. You should check this page regularly to ensure you are happy with any changes. If we propose to make any material changes, we will display a notice on our website highlighting an updated privacy notice and identifying the changes.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Abbeyford Leisure collects and processes your personal data through your use of this website or otherwise, including any data you may provide through this website, whether you sign up to our newsletter; book a holiday; purchase a holiday home/caravan, product or other service; express an interest in our products/services; visit our Park; take part in a competition or market research, or make a general enquiry. This website is not intended for children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice does not apply to any employee personal data.

Controller

This privacy notice is issued on behalf of the Abbeyford Leisure Group so when we mention "Abbeyford Leisure", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Abbeyford Leisure Group responsible for

processing your data. Please see the Glossary and Internal Third Parties for details of the relevant Abbeyford Leisure companies and associates which may process your data. Abbeyford Caravan and Trailer Company Limited and Abbeyford Caravan (Scotland) Limited are the joint controllers and responsible for this website.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Our details for both controllers are:

Abbeyford Caravan and Trailer Company Limited

Email address: info@abbeyford.com

Postal address: Abbeyford Leisure, Abbeyford House, Unit 3, Ffordd Richard Davies, St Asaph Business Park, St Asaph, LL17 0LJ, North Wales.

Telephone number: 01745 825555

Abbeyford Caravan Company (Scotland) Limited

Email address: info@abbeyford.com

Postal address: Abbeyford Leisure, Abbeyford House, Unit 3, Ffordd Richard Davies, St Asaph Business Park, St Asaph, LL17 0LJ, North Wales.

Telephone number: 01745 825555

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to your information and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by contacting us on the details 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.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender. Where you enter a CCTV zone on any of our Parks, this could also include your image and car registration plate.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat

the combined data as personal data which will be used in accordance with this privacy notice.

We only collect any **Special Categories of Personal Data** about you (this includes details about your health and genetic and biometric data) or about criminal convictions and offences where the law allows us to do so.

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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for, book, rent or purchase any of our holidays, caravans, products or services;
 - create an account on our website;
 - subscribe to our newsletter, other service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, pixel tags, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies such as Google Analytics. Please see our cookie policy for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
 - a. analytics providers such as Google based outside the UK and EU;
 - b. advertising networks and advertisements via Twitter, Facebook, YouTube (a Google company), Google and Google display network (based outside the UK and/or EU); and
 - c. search information providers (which may be based inside or outside the EU).
- Contact, Financial and Transaction Data from providers of technical, payment, insurance, finance and delivery services such as Stripe Inc, Global Payments LLP, Worldpay (UK) Limited or Thistle Insurance Services Limited;
- Identity and Contact Data from data brokers or aggregators, or review or booking sites such as TripAdvisor.
- Identity and Contact Data from publicly available sources such as the Electoral Register (based inside the UK) but also (if you share information in relation to us and/or the Transaction on these sites) from general social networks such as Facebook, Instagram, Google+/Google LLC and Twitter (all based in the USA).
- Identity, Contact and Transaction Data from regulators or registries such as the Information Commissioner's Office, the Financial Ombudsman or our trade association the British Holiday & Home Parks Association.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we rely on consent or legitimate interests as a legal basis for processing your personal data in relation to sending third party direct marketing communications to you. You have the right to stop marketing or withdraw consent to marketing at any time by [contacting us](mailto:info@abbeyford.com) at info@abbeyford.com.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Examples of data	Lawful basis for processing including basis of legitimate interest
To take steps to or to: (a) Answer your queries or provide you with requested information (b) Provide quotations or further information in relation to those quotations	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Usage (g) Marketing and Communications	(a) Consent (b) Necessary for our legitimate interests (for running our business; to keep our records updated and to study how customers use our products/services, to develop them; to grow our business and to inform our marketing strategy)

		We will rely on the most appropriate lawful basis for processing the data.
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) to deal with manufacture warranty claims in relation to holiday homes on your behalf	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To provide you with services during your stay in our Parks such as Wi-Fi	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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

<p>(b) Asking you to leave a review or take a survey</p>		<p>study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</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) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>(a) Consent (b) Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To notify you (or other individuals involved with/using the products) of unforeseen circumstances or developments in relation to the products</p>	<p>(a) Identity (b) Contact (c) Transaction (d) Profile (e) Usage</p>	<p>(a) Necessary to protect someone's vital interests. This includes health and safety or security concerns or where we discover a supplier has breached our specifications and supplied something which was sub-standard) (b) Necessary to comply with a legal obligation (for example product recalls) (c) Necessary for our legitimate interests (for running our business; to</p>

		<p>keep our records updated; maintaining individual expectations; and to study how customers use our products/services)</p>
--	--	---

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers and marketing from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). We may provide you with this information through online digital services (e.g. online advertising, social media communications), or by direct marketing (e.g. phone, e-mail, text, post), unless you have asked us not to do so.

If you have signed up for marketing information online or entered a competition or registered for a promotion, we will ask you to tick the box to give consent to receive marketing communications from us and we use consent as the legal ground for processing personal data for direct marketing purposes in this circumstance.

For those who have booked a break with us or purchased goods or services from us, we do not require consent and instead use the legal ground of legitimate interest for marketing purposes. We must also comply with the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR). This law allows us to contact customers, using a soft opt in exemption, as long as we give customers the option to opt out of any future marketing communications. This means that we give you the chance on every marketing communication to opt out of future marketing by clicking the unsubscribe link on all email messages. You can also contact us by phone to update your marketing preferences.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Abbeyford Leisure group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us or by clicking the unsubscribe link in the footer of our marketing emails.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a for example, a holiday booking, a caravan or other product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.

- External Third Parties as set out in the Glossary.
- 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.

6. International transfers

We share your personal data within the Abbeyford Leisure Group. This will not involve transferring your data outside the European Economic Area (**EEA**).

The majority of our external third parties are based within the European Economic Area (**EEA**) so their processing of your personal data will not be likely to involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we aim to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where your personal data is transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US; or
- One of the derogations from the prohibition on transfer of personal data outside of the EU applies.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. 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 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.

8. Data retention

How long will you use my 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

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.

What we may need from you

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.

Time limit to respond

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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before

we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Abbeyford Leisure Group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006) acting as joint controllers or processors and who are based in the UK. This includes Abbeyford Leisure Limited (the holding company) and its subsidiaries, Abbeyford Caravan and Trailer Company Limited and Abbeyford Caravan (Scotland) Limited. These companies provide IT and system administration services, management, planning and decision making and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the UK who provide services, whether as suppliers, subcontractors, contractors or agents for the purpose of any contract we enter with them or you. For example, this includes:
 - Payment service providers (such as Stripe and Global Pay who will process your payment);
 - Fraud prevention agencies;

- Technology, IT and system administration services (who provide us with database hosting, wifi, server access and general IT support and maintenance);
- Suppliers and manufacturers who provide us with labour, goods, services and/or materials to fulfil your contract.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Local authorities such as HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Social media and/or review sites (but only where you share information in relation to us and/or the Transaction on these sites and we respond to that disclosure) such as Facebook, Instagram Google+/Google LLC and Twitter.

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. 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.