

LAVENDER HILL HOLIDAYS LIMITED

PRIVACY POLICY

We ask that you read this website privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This website privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Transferring your information out of the UK and EEA
- Cookies
- Marketing
- Your rights
- Keeping your personal information secure
- How to complain
- Changes to this website privacy policy
- How to contact us
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Who we are

This website is operated by Lavender Hill Holidays Limited, company number (07207461). We are an accommodation provider offering boutique cottages within Somerset and more information about us can be viewed here at [Lavender Hill Holidays](#).

We collect, use and are responsible for certain personal information about you. When we do so we are regulated by data protection laws which apply in the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

Our website

This privacy policy relates to your use of our website, [Lavender Hill Holidays](#) and how we collect personal information about you during the provision of our services to you.

Throughout our website, we may link to other websites owned and operated by trusted third parties to promote sites where our Properties (as defined in our Terms and Conditions) are advertised and in order to make additional services available to you, e.g. outdoor activities and adventures which may be of interest to you during a stay at one of our Properties. How those companies collect and use your personal information will be set out in their own privacy notices.

Our collection and use of your personal information

We collect personal information about you in a number of circumstances as set out in the table below.

We collect this personal information from you either directly, such as when you register with us, contact us or make a booking via our website or indirectly, such as your browsing activity while on our website. For information about how we cookies please review our Cookie Policy [here](#).

We may collect and use the following personal information about you:

- your full name, address and contact details
- the age of any children staying at our Properties;
- bank account and payment details;
- details of any feedback you give us by phone, email, post or via social media;
- information about your browsing activity on our website including how you engage and interact with the website (and your IP address if you choose to use the guest Wi-Fi).

This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing our services to you.

This website is not intended for use by children and we will only collect or use personal information relating to children to inform us when you make your Booking of any children within your group who will be staying at one of our Properties.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why. These may include the following:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose;
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract;
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations); and
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Personal information

The table below explains what we use (process) your personal information for, our reasons and legal basis for doing so:

What we use your personal information for	What information we ask for	Our reasons and legal basis
To provide our services to you.	As set out in the following table cells below.	To provide our services to you in accordance with the terms and conditions between us;

<p>Account Creation and Management</p>	<ul style="list-style-type: none"> ● First name and surname; ● Email address; ● Address; ● ID/username, and password; ● Date of Birth (and the Date of Birth of others within your Group); ● Booking details; ● User generated content; and <p>Other information you have shared with us e.g. by contacting us.</p>	<p>To:</p> <ul style="list-style-type: none"> ● manage your Booking; ● send you marketing communications (when you have opted in); ● offer a personalised service; ● allow you to manage your preferences; ● monitor and improve our Site; ● run analytics or collect statistics; ● secure our Site; ● respond to your questions and otherwise communicate with you. <p>We rely on the performance of a contract when you create your account as the lawful basis for collecting and using your personal information.</p> <p>Our legitimate interests are to improve our services, to better communicate with you and to prevent criminal activity.</p>
<p>Newsletter and marketing subscription</p>	<ul style="list-style-type: none"> ● First name and surname; ● email address; ● address; ● ID/username, and password; ● personal description or preferences; ● Booking details; ● user generated content; and <p>other information you have shared with us e.g. by contacting us.</p>	<p>To:</p> <ul style="list-style-type: none"> ● send you marketing communications (when you have opted in); ● show you marketing communications on other websites, including social media platforms. ● maintain an up to date list if you have opted out of marketing communications and have asked not to be contacted; and ● run analytics or collect statistics. <p>We rely on your consent as the lawful basis for collecting and using your personal information when you sign up to our newsletter.</p> <p>Our legitimate interests are to</p>

		improve our services and to better communicate with you.
Booking management	<ul style="list-style-type: none"> • First name and surname; • email address; • address; • personal description or preferences; • transaction information; • payment information; and • order history (e.g. whether you have made a Booking with us before). 	<p>To:</p> <ul style="list-style-type: none"> • process your Booking; • manage any communications you have with us regarding your Booking; • manage any dispute relating to a Booking placed by you; and • run analytics or collect statistics. <p>We rely on the performance of a contract when you make a Booking by placing an order for services and we manage your Booking as the lawful basis for collecting and using your personal information.</p> <p>It is also a legal obligation for us to retain certain personal information for tax purposes.</p> <p>Our legitimate interests are to improve our services, to better communicate with you, and to prevent criminal activity.</p>
User Generated Content	<ul style="list-style-type: none"> • First name and surname; • email address; • address; • personal description or preferences; and <p>other information you have shared with us e.g. by contacting us.</p>	<p>To:</p> <ul style="list-style-type: none"> • use the content you have created and/or shared in accordance with the specific terms and conditions accepted by you; • run analytics and statistics; and • add your content to your profile so we can understand your interests and preferences. <p>We rely on the performance of a contract as the lawful basis for collecting and using your personal information when you submit information to us.</p>

		Our legitimate interests are to improve our services and to better communicate with you.
Enquiries	<ul style="list-style-type: none"> • First name and surname; • phone number; • email address; and other information you have shared with us e.g. by contacting us. 	<p>To:</p> <ul style="list-style-type: none"> • answer and manage your enquiries; • run analytics and statistics; and • add your questions or concerns to your profile so we can understand your interests and preferences. <p>We rely on the performance of a contract as the lawful basis for collecting and using your personal information in order to respond to your enquiries.</p> <p>Our legitimate interests are to improve our services, to better communicate with you and to secure our tools.</p>
Using guest Wi-Fi The information is used to provide you with the access to the guest Wi-Fi.	<ul style="list-style-type: none"> • IP address. 	<p>To:</p> <p>Allow you access to use our guest Wi-Fi.</p> <p>We rely on consent as the lawful basis for collecting and using your personal information when you register to use the guest Wi-Fi.</p> <p>Our legitimate interests are to improve our services to you.</p> <p>Once you have stopped using the guest Wi-Fi, we will not continue to process your IP address details.</p>
Profiling Profiling enables us to determine aspects of our customers behaviour, interests and habits	<ul style="list-style-type: none"> • We may collect any personal information as set out in the table above. 	<p>To:</p> <ul style="list-style-type: none"> • Send and display personalised communications.

to be analysed and predicted.	<p>We collect this information from various sources which include:</p> <ul style="list-style-type: none"> ● Internet and browsing history; ● Data derived from existing customer relationships; ● Location data; ● Buying habits; ● Social network information; and ● The Internet of Things 	<p>We rely on consent as the lawful basis for collecting and using your personal information in order to send you tailored communications specific to your interests.</p> <p>You may object at any time to the use of your personal data for “profiling” by contacting us using the contact details below.</p>
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How long your personal information will be kept

We will keep your personal information during the provision of our Services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law.

We will not retain your personal information for longer than necessary. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Who we share your personal information with

We routinely share your personal data including as your name, e-mail address and details of your booking with our booking management system provider (“Anytime Booking”). This data sharing enables us to schedule and manage your booking with us.

We also share personal information with:

- third parties we use to help deliver our services to you, e.g. payment service providers;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;

We will share personal information with law enforcement or other authorities if required by applicable law. We will not share your personal information with any other third party.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

Transferring your personal information outside of the UK and EEA

We may transfer your personal information to the following which are located outside the United Kingdom (UK) and European Economic Area (EEA) as follows:

- with your and our service providers whose servers may be located outside the UK/EEA; or
- if you are based outside the UK/EEA.

Our legal basis for transferring your personal information outside the EEA is fulfilment of a contract as otherwise we would be unable to deliver our services to you.

Non-UK/EEA countries do not have the same data protection laws as the United Kingdom and EEA. Some may be deemed to be adequate, however where this is not the case we will ensure the transfer complies with data protection law and all personal information will be secure.

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These cookies help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies, our use of cookies and when we will request your consent before placing them and how to disable them, please see our Cookie Policy [here](#).

Marketing

We would like to send you information about services and special offers, which may be of interest to you. In some cases, we have a legitimate interest in processing your personal information for marketing purposes (see the table above). This means that we do not always need your consent to send you promotional and marketing communications. However, if we do need your consent, we will ask for it. Where we have your consent or it is in our legitimate interests to do so, we may send you marketing communications by email and text message (SMS).

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

- contacting us at the details set out below; or
- using the ‘unsubscribe’ link in emails or ‘STOP’ number in texts

The marketing communications may not stop immediately. It may take a few days for the systems to update but we will do our best to cease sending you marketing communications as soon as practicable.

For more information on your rights in relation to marketing, see ‘Your rights’ below.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations

Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights under the UK General Data Protection Regulation which can be viewed [here](#).

If you would like to exercise any of the above rights, please email or write to us. Our contact details are set out below.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The UK [General Data Protection Regulation](#) also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this website privacy policy

This website privacy policy was published on **[INSERT DATE]** and last updated on **[INSERT DATE]**.

We may change this website privacy policy from time to time, when we do we will inform you via email.

How to contact us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [Lavender Hill Holidays](#) or by post addressed to *Lavender Hill Holidays Limited, Newton Farm, Bicknoller, Taunton TA4 4EU*.

Do you need extra help?

If you would like this website privacy policy in another format (for example, audio, large print, braille) please contact us at the details above.