

PRIVACY POLICY

Who We Are

[Glen Lodge Bawburgh Limited] ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Glen Lodge Bawburgh's registered office is at Glen Lodge, Marlingford Road, Bawburgh, Norfolk NR9 3LU and operates as a limited company. We are registered on the Information Commissioner's Office Register; registration number Z9385021, and act as the data controller/data processor when processing your data.

Our designated Appointed Person is **Krissy Wright**, who can be contacted at <u>krissy@bawburgh.com</u> **or telephone 01603 740404.**

Information That We Collect

Glen Lodge Bawburgh processes your personal information to meet our legal, statutory and contractual obligations and to help us provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we may collect from you is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Bank Account Details
- National Insurance Number
- Passport Number
- Driver's License Number
- Purchase history
- Special Category Data
- Device data e.g. mobile phone

We collect information in the ways below: -

- Online forms
- Website orders
- Employment CVs
- Employment applications
- Membership Applications
- Website cookies and tracking data
- Tee Time Reservations
- Accommodation Room reservations
- Table/dining reservations

How We Use Your Personal Data (Legal Basis for Processing)

Glen Lodge Bawburgh takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address or email address
- We collect and store your personal data as part of our legal obligation for business accounting, HR and tax purposes
- We will send you periodic marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be nonintrusive and is processed on the grounds of legitimate interests and/or consent

Your Rights

You have the right to access any personal information that **Glen Lodge Bawburgh** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Sometimes we will need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf, for example an email processing company distributing our newsletters. However, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Safeguarding Measures

Glen Lodge Bawburgh takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: –

- Website SSL certified
- Restricted access
- IT authentication
- Firewalls
- Anti-virus
- Staff training

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. **Glen Lodge Bawburgh** only stores or transfers personal data outside the EU to our own service providers. These are fully GDPR compliant.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Glen Lodge Bawburgh** however, as this information is required for **us to provide you with our legitimate interests**, we will not be able to offer some/all our services without it.

Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We process personal information for certain legitimate business purposes which include some or all of the following:

• Where the processing enables us to enhance, modify, personalise or otherwise improve our services / communications for the benefit of our customers

- · To identify and prevent fraud
- To enhance the security of our network and information systems
- To better understand how people interact with our website
- To provide postal and email communications which will be of interest to you
- To determine the effectiveness of promotional campaigns and advertising
- For our own commercial interests
- To provide you with wireless internet access while at our facility

How Long We Keep Your Data

Glen Lodge Bawburgh only ever retains personal information for as long as is necessary and we have review and retention policies in place to meet these obligations. Where you have made a purchase with us we are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging A Complaint

Glen Lodge Bawburgh only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with Glen Lodge Bawburgh or the supervisory authority.

Glen Lodge Bawburgh

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Information Commissioner

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Cookie Notice

A 'cookie' is a small piece of data sent from a website and stored on the user's device by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit www.aboutcookies.org

General Disclaimer

Whilst every care has been taken in the preparation of the contents of this website, the security, fitness for purpose and the accuracy of such information is not implied and cannot be guaranteed. All information and materials on this website are for general information and do not constitute any advice or recommendation (professional or otherwise).

You should not rely upon any information on this website in making, or refraining from making, any specific decisions. Anyone who uses information contained on this site, does so at their own risk and shall be deemed to have indemnified Glen Lodge Bawburgh from any injuries or damages arising from such use.

We reserve the right to revise any dates, prices or information as a consequence of currency fluctuations, product price increases, product availability or other circumstances outside our control, and recommend that visitors contact Glen Lodge Bawburgh for confirmation before taking any action based on the contents of this website.

External Links Disclaimer

The links to third party external sites provided throughout this site are for the convenience of visitors only. These sites are maintained by other organisations and Glen Lodge Bawburgh is not responsible for the content of these external sites and does not necessarily endorse the views or agree with the information held on these sites. In addition, we shall not be a party to, or in any way be responsible for, any transaction concerning goods or services available from such third party sites.

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