

How we use and protect your data (our Privacy Policy)

Lanhydrock Hotel and Golf Club are committed to protecting and respecting your privacy.

This policy, together with our terms of use <http://www.lanhydrockhotel.com/privacy-policy/> sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of Data Protection Legislation (being the General Data Processing Regulations 2016 (**GDPR**) and the Data Protection Act 2018), the data controller is Lanhydrock Hotel & Golf Club.

Purpose of this privacy policy

This privacy policy (the **Policy**) aims to give you information on how Lanhydrock Hotel and Golf Club collects and processes your personal data through your use of our website, <http://www.lanhydrockhotel.com> (the **Website**), including any data you may provide through the Website, for example when you sign up to our newsletter, purchase a product or service or take part in a competition.

It is important that you read this Policy 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 Policy supplements the other notices and is not intended to override them.

Controller

Lanhydrock Hotel and Golf Club is the controller and responsible for your personal data (collectively referred to as "Lanhydrock", "we", "us" or "our" in this Policy).

Director, Graham Bond is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact him using the details set out below.

Contact details

Our full details are: Lanhydrock Hotel & Golf Club

Full name of legal entity: Lanhydrock Golf Club Limited

Contact name: Director, Graham Bond

Email address: info@lanhydrockhotel.com

Postal address: Lostwithiel Road, Bodmin, Cornwall, PL30 5AQ

Telephone number: 01208 262570

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 the privacy policy and your duty to inform us of changes

This version was last updated in November 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current and the accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at info@lanhydrockhotel.com, or write to us at: Lanhydrock Hotel & Golf Club, Lostwithiel Road, Bodmin, Cornwall, PL30 5AQ. Alternatively, you can telephone 01208 262570.

We may collect and process the following personal data 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).

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **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.

How your personal data is collected

- When you enter into a contract with us for the provision of our services.
- Information that you provide by filling in forms on the Website www.lanhydrockhotel.com. This includes information provided at the time of registering to use our website, subscribing to our service, posting material or requesting further services.
- We may also ask you for information when you enter a competition or promotion sponsored by Lanhydrock Hotel and Golf Club, and when you report a problem with our website.
- If you contact us, we may keep a record of that correspondence.
- Lanhydrock Hotel and Golf Club may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, blogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

We use your personal data in the following ways

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 it is necessary for our legitimate interests to provide you with information, products or services that you request from us or which we feel may interest you or where you have consented to be contacted for such purposes.
- For our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve the Website.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To ensure that content from the Website is presented in the most effective manner for you and for your computer.
- Where we need to comply with a legal or regulatory obligation.

The legal bases that we rely on in processing your personal data are either:

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

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the details below.

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.

If you make a purchase from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

Where we store your personal data

By submitting your personal data, you agree to this transfer, storing or processing of data. Lanhydrock Hotel and Golf Club will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. 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 data 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 in line with our obligations under Data Protection Legislation.

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. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Data retention

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and accounting purposes.

In some circumstances you can ask us to delete your data see 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. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day).

We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in PL30 postcodes). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

Disclosure of your information

We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may transfer your personal data to the prospective seller or buyer of such business or assets.
- If Lanhydrock Hotel and Golf Club or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use <http://www.lanhydrockhotel.com/terms-and-conditions/> and other agreements; or to protect the rights, property, or safety of Lanhydrock Hotel and Golf Club, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Third Party Service Providers working on our behalf

We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and sending you emails). However, when we use third party service providers, we disclose only the personal data that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Third Party Product Providers we work in association with

We work with carefully selected Online Travel Agents (e.g. [Booking.com](http://www.booking.com)). When you enquire about or book with these third parties, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share required information about you with us (e.g. room type purchased and dates of stay) which we will use in accordance with this Privacy Policy.

When you are using our secure online booking system, your purchase is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

How do I opt out?

You have a choice about whether or not you wish to receive information from us and in relation to third party marketing. We will not make contact with you unless you have given your consent to be contacted by us. If then, you no longer want to receive direct marketing communications from us about the hotels and our favourite local areas, then you can change your preferences or completely unsubscribe in one of two ways:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of marketing emails sent to you
- Email info@lanhydrockhotel.com or telephone 01208 262570 and we will process your request within 7 days

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

IP Addresses

We may collect information about your computer, including but not limited to (where available), your IP address, operating system and browser type for administration purposes and to produce internal reports. This is statistical data relating to a web user's browsing actions and patterns and does not specifically identify you as an individual so is not classified as personal data under Data Protection Legislation.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with 128 Bit encryption on SSL across the entire website. When you are on a secure page, a lock icon will appear in the address bar of modern web browsers such as Microsoft Edge and Google Chrome.

Once we receive your information, we make our best effort to ensure its security on our systems in line with our obligations as a data controller under the Data Protection Legislation. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. This automated processing is intended to evaluate certain personal aspects of an individual. We may also use your personal information to detect and reduce fraud and credit risk.

Use of 'cookies'

Like many other websites, Lanhydrock Hotel's websites uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies are sometimes used to improve the website experience of a visitor to a website. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to pre-fill some information on forms and to enable us to see what people view on the website and for how long. The use of cookies enables us to improve our website, deliver effective marketing and offer a more personalised service.

We may also use the cookies to gather information about your general internet use to further assist in developing our website. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive and then stored there and transferred to us where appropriate to help us to improve our website and the service that we provide to you.

It is possible to switch off cookies by adjusting your browser preferences or using a dedicated browser extension.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union (“EU”). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. The GDPR is the Data Protection Legislation applicable across Europe. By submitting your personal data, you’re agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Links to other websites

Our website may contain links to other websites run by other organisations. This Policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you were referred to our Website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

Your Legal Rights

Your legal rights in relation to your personal data that we hold for you include the right to:

- request access to your personal data (known as a Data Subject Access Request);
- request a correction;
- request erasure where there is no good reason for us continuing to process it or where you have successfully exercised your right to object to processing;
- object to processing where we are relying on a legitimate interest (or those of a third party) and there is something that 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;
- request restriction of processing – to ask us to suspend the processing of your personal data, for example where you want to establish the accuracy of the data or where you need us to hold the data even if we no longer required it as you need it to establish, exercise of defend legal claims;
- request the transfer of your personal data to you or a third party;

- withdraw consent at any time where we are relying on consent to process your personal data. If you withdraw your consent we may not be able to provide certain products or services to you.

You can also exercise these rights at any time by contacting us at info@lanhydrockhotel.com or by telephone on 01208 262570.

Changes to our privacy policy

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you by email.

Contact us

Questions, comments and requests regarding this Policy are welcomed and should be addressed to bond@lanhydrockhotel.com.