

EC GLOBAL LIMITED T/A STONEYBECK INN (“STONEYBECK”)

PRIVACY NOTICE

Protecting your personal information is extremely important to us at Stoneybeck. The following Privacy Notice sets out how we collect, use and store your personal data and how we make sure your data is secure. This notice applies to you if you provide any personal information to us by which you can be identified, even if you do not subsequently become a customer or supplier of Stoneybeck.

If you have any questions about how we may use your personal information, please contact us using the details below.

1. THE INFORMATION WE COLLECT

We will only collect data from you that we actually need to enable us to perform our legal, or contractual obligations or if we have your permission.

This may include:

- a) your name
- b) your home and or business address
- c) contact information (e.g. telephone number, mobile, email)
- d) special personal information (if necessary)¹
- e) financial information such as bank account details or card details for payment purposes

2. HOW WE COLLECT YOUR DATA

We collect information about you in a variety of ways:

- Through your enquiry/booking via post, telephone, email, through our website, or by other electronic means

¹ Some personal information is legally described as “special category” data. This may include details about your physical health such as dietary requirements or disabilities. It may be necessary to collect this information to allow us to ensure we offer you appropriate products or services. We will only collect this data if it is completely necessary and if you do provide such information you also agree to give specific consent for us to process this data as appropriate under the terms of this privacy notice. Where we need to collect and process this type of data about you, by providing this information to us you give your explicit consent for us to process this special data as set out in this privacy notice.

- Information received via a third party, such as a booking agency where you have agreed for your information to be shared with us
- By communicating with us on social media such as Facebook
- Where you have given permission for your information to be provided to us

3. USING YOUR PERSONAL DATA

We may only use/process your personal information lawfully if it falls into one or more of the following categories:

- a) If you give specific consent
- b) In order for us to meet our contractual obligations to you
- c) Where we are legally required to do so
- d) To protect your vital interests
- e) If it is in the public interest
- f) If we have a legitimate interest in doing so

4. HOW STONEYBECK PROCESSES YOUR INFORMATION

Enquiries & Bookings

If you make an enquiry or ask us for a quote or if you make a provisional reservation or booking, we will use your information to help us provide you with confirmation of availability or reservation of our facilities. If this information is not available, we may not be able to provide those details.

The information will be used to enable us to contact you via letter, email, text or telephone about your enquiry or booking and if relevant to keep you informed of relevant updates to circumstances.

If a third party introduced you to us, such as a booking agent, we will share information about your enquiry or booking.

We may share your information with:

- a) any companies we work with such as professional advisers (eg solicitors) or on an outsourced basis such as insurers or our IT service provider but this will only happen if they agree to keep the information confidential.

- b) Any regulatory authority such as the Information Commissioners Office which may request certain information where we have a legal or regulatory obligation to provide this.

5. OTHER PURPOSES FOR PROCESSING YOUR PERSONAL DATA

Client Feedback

Where we have a copy of your personal information we may contact you to ask you to provide a review about the services you've received which may help us improve our current services. Although this information would really help us, you wouldn't be required to provide us with this information unless you were happy to. We consider that it is in our legitimate interests to contact you in this way.

Legal or Regulatory Obligation

We are required to process your personal information where we have a legal or regulatory obligation to do so.

Responding to Complaints or Enquiries

If you make an enquiry or complaint to us, we will use your personal information to investigate the complaint and deal with your enquiry. We have a legal obligation to deal with your complaint appropriately.

Internal Analysis

As part of our legitimate interest to develop our business we will use your personal information to assess our performance and for statistical analysis. We will use as little personal data as we can to achieve this. We may also share this analysis with third parties who provide us with services and where we have a contractual obligation to do so.

Social Media

We use publicly available social media platforms to promote our services. If you post a message on our Facebook page or similar platforms you should be aware that:

- the social media web pages are publicly available and you must not provide any personal or sensitive information on our pages that are accessible to the public; and
- each social media platform will process any personal information you provide through the platform and will be processed in accordance with its own privacy policy. The privacy policies are available to view on each social media platform.

Cookies

When visiting our website, some information may be collected automatically using 'cookies'. These are small text files that allow the processing of your data and enable us to analyse how the website is being used. Cookies can be temporary or permanent.

Temporary cookies are part of the security process while you are using the website; permanent cookies identify the link you used to find our website, check your browser so that we can make sure that our website and services work well with your computer and to help us monitor traffic on our website.

Cookies allow sites to do things like provide personalised content and remember their log-in details and settings. You can turn them off - this won't stop a website from working, but it might mean it won't work as well as it could, or that you have to do the same thing more than once. Cookies tell website owners things like: what search engine a visitor used to find the website, how often they've visited it, how long they've spent on it, and so on.

The following cookies are the ones we use at Stoneybeck:

- Facebook conversion tracking; and
- Google Analytics – this is used to collect information about how visitors use our website. They keep track of when a visitor enters and leaves the website and any search engines and keywords that are used, including any personal and/or special categories of data.

For more information about cookies and how to turn them off, please visit the websites of the relevant provider.

6. SHARING INFORMATION OUTSIDE THE EEA

We will only share your personal information outside the European Economic Area (EEA), where we have your consent or to comply with a legal obligation, or where we work with a business partner to enable us to provide you with our services, and they process information outside of the EEA.

If we do share your information outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA ensuring appropriate safeguards are in place. This may include putting in place a contract with the business partner that means they must protect the personal data to the same standards as the EEA.

More information on this can be found on the European Commission Justice Website.

7. SECURITY

We take the protection of personal information seriously and will maintain appropriate measures to maintain the confidentiality, integrity and availability of the information you have provided. Such measures include:

- company security policies and standards
- staff security awareness and training
- access controls to prevent unauthorised access to the information
- encryption
- anti-malware technologies
- security monitoring & testing
- secure archiving and deletion
- compliance with industry regulation and legislation

8. CONTACTING YOU

To help us keep you up to date about the service we provide to you and to ensure that you're kept fully informed, we may contact you by letter, telephone, email, text message, social media or may send you messages by any online customer platforms or other electronic means.

If you have provided us with your consent or where we are legally entitled to do so, we may contact you to let you know about other offers, products and services that we provide which may be of interest to you. We may do this through post, emails, text messages, telephone, social media or other electronic means.

If you do not want to be contacted in a particular way then you can request this at any time, but if we are providing a service to you, we do need to be able to send you communications. This can often be due to a legal or contractual requirement.

It is important that you keep us up to date when you change your contact details to ensure that we use your up to date contact information.

You can easily let us know at any time if you would no longer like to receive these messages using the details below.

9. YOUR RIGHTS

Access to your personal information

You have the right to request from us a copy of the personal information that we may hold about you. This is called a “Data Subject Access Request”. You can request this information by contacting us as set out below. We won’t charge to provide you with this information.

Before providing this information to you (or to another person or company where you have requested), we may ask for proof of identity or ask sufficient questions to enable us to locate the information and ensure that we’re only providing it where you have given your agreement.

Right to have your personal information corrected

If the personal information we hold about you is incorrect you have the right to request that we correct this.

Right to stop or limit the processing of the data we carry out

You may request that your personal information is deleted or that we stop processing the information if we’re no longer entitled to process it. There may be occasions where we are unable to delete the data due to our legal or regulatory obligations. We will however discuss this with you if you request for your information to be deleted.

Portability

In some cases, you may be able to request for your information to be provided to you or to another company in a format that can be processed electronically by you or the other company. If you want to request this, you’ll need to contact us and we will do our best to accommodate your request

10. HOW LONG WE KEEP YOUR PERSONAL DATA

- a) If you enter contractual arrangement, we will keep a record of your personal information where we are required to keep your data to meet our legal obligations. This will normally be kept for 6 years after we have finished providing this service.
- b) If you do not enter into any contractual arrangement with us, your personal information will normally be deleted after 2 years unless there is any other reason to keep your personal information, for example, if you have given your consent for some other purpose.
- c) After the above time periods, we will delete or anonymise the data so that it cannot be linked back to you.

CONTACT US

If you have any questions or queries about how we use your personal information you can contact us at the address or email below:

Stoneybeck Inn
Bowscar
Penrith
CA11 8RP

Email: reception@stoneybeckinn.co.uk

If you are not happy with how we process your personal information you should contact us in the first instance. If you're not happy with how we have dealt with your complaint you have the right to lodge a complaint with the Information Commissioner's Office. You can find their details on their website at <https://ico.org.uk/>