**GDPR: General Data Protection Regulation for Customers**

1. **Summary (Awareness)**

An update to our processes and documentation has been implemented to meet the new requirements of the GDPR, the new European data protection law which came into force on 25 May 2018. Our privacy policy shows how we process and store your personal data.

**Important changes include:**

* We set out what types of information we collect, when, and what we use your personal information for
* We explain when others may be able to see your identity
* We set out clearly in what situations we pass on any of your personal information to anyone else
* We include information about how long we keep personal data for, how you can find out what personal data we have about you, and how to correct it
* We include contact details for our Data Protection Officers

**The GDPR includes the following rights for individuals:**

• the right to be informed; • the right of access; • the right to rectification; • the right to erasure; • the right to restrict processing; • the right to data portability; • the right to object; and • the right not to be subject to automated decision-making including profiling.

If for any reason you don’t agree with our Privacy Policy or Notice and would like to close your account, you can do so. Please contact reception and we will delete your details unless there is a legitimate reason to retain any information.

1. **Privacy Notice for Customers (Existing and Potential)**

When we collect personal data we provide our identity through our website, emails, over the telephone or in person at the premises.

Information we hold includes:

* Personal data: Customer name/s, address, contact number, email, car registration plate/s, number and names of occupants for a stay
* Children’s ages brackets for pricing (if under 3 years old, if 3 to 16 years old or if over 16 years old). Names are required in online reservation process.
* Email address in addition to the above, if you disclose it to us.
* We will not contact you by email or phone unless it is related to your reservation, enquiry or personal possessions, without prior consent.
* Payment card details (verbally given over the phone or in person) when you make a payment to confirm a reservation or pay a balance. These details are not held for any length of time except to process the payment as a once only event and are not stored with us (but processed through our Merchant Service Provider).
* Cheque details for payment, necessity if received by post or in person, kept until banked.
* Caravan details and registration plate, insurance details (policy held in Reception).
* CCTV images which may show images of an identifiable individual. We have this for customer, staff and visitor safety and Park Security and it is accessible by Management, used in the event of an incident and maybe used in a court of law. Please ask to see our CCTV Policy for more details if necessary.

***Privacy Notice for Staff and Contractors (Existing and Potential)***

*A separate document issued to Staff and Contractors: Please ask a Data Protection Officer for more information if required.*

Personal Data sources include:

* The customer or person themselves, a relation, a friend
* Third parties or a public source such as Caravan Supplier/Company may contact us regarding making a reservation on the customers behalf.
* Forms completed on paper, online though our website or a third party app, over the phone or verbally in person.
* Feedback or Reviews

We intend to use your information for legitimate reasons to:

* Register you with our business and create a contract regarding a holiday/ stay/ storage reservation or booking enquiry, only if requested to by yourself or a third party.
* Calculate the correct cost of the booking or reservation, and manage payments.
* Contact you (by email or phone or through a third party app) in response only to your enquiry, with no obligation to make a reservation.
* Contact you (by post or email) with the provisional booking if you consent, so you can check the details are correct prior to confirming the reservation with a deposit.
* Contact you (by post or email) with the confirmed booking and payment details when a payment is made and the balance due.
* Send you invoices or outstanding reminders should a balance be due for payment.
* Offer or update you with upcoming pitch or storage availability in response to a direct enquiry from yourself.

Lawful basis of processing Personal Data:

* By confirming a booking or reservation you are entering a contract with us to enable us to reserve an area or space suitable for your unit, for dates you have requested with occupants you have informed us of, and we will use your provided data legitimately for the process of carrying out this task and for the daily running of the Park business.

Who we share your data with:

* We would not share your personal details with any third party or outside business, without legitimate cause.
* We do not send (post or email or phone) marketing/promotional material, unless a tariff or information is directly requested and consent is given and documented.
* Occasionally we may need to share your details with merchant services or our point of sale (POS) supplier to confirm a payment has been authorised.
* In the event a debt begins accruing on a booking or reservation and we have attempted to contact you with the outstanding bill, we would legitimately seek advice from a legal professional and debt collector to retrieve money owed, and would pass on your personal data to assist with this situation.
* Our staff will use your personal data to assist in the daily running of the Park (for legitimate business reasons only) for example: daily arrivals or departures lists, newspaper order lists, waiting lists for pitches. Access to our web-based systems (e.g. GemaPark, Talech and emails), are accessible by our staff through legitimate log in passwords. Staff can therefore access data outside the premises, through internet connection and log in. We do not permit access externally to the Park premises unless it is required legitimately for the process of carrying out a task to ensure the daily running of the Park business, and with Managerial prior permission.
* Data security measures are in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to 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.

Our data retention periods:

* We keep your personal data for as long as necessary to fulfil the contractual purposes we collected it for. This includes; satisfying any legal, accounting, or reporting requirements.
* To determine the appropriate retention period we consider the amount, nature and sensitivity of the personal data, and the potential risk of harm from unauthorised use or disclosure.
* Generally if you are a regular customer we keep a record of your personal contact details and the previous reservations you have made, to help assist us finding your preferred and most suitable pitch areas, to ensure payment records are maintained and barrier access is activated. From 2020, this is held on two database’s, as we switch over from a computer data base (Accoman) not connected to the internet onto an internet based computer data base (GemaPark- Netguides).
* If you haven’t stayed with us for 6 years we will consider deleting your information if your payment account is paid up to date and there is no legal need to retain it.

1. **Privacy Policy**

* We will be transparent, clear and communicate with our Site Visitors & Employees.
* We will inform them how we collect, store and use their data.
* We will comply with any Site Visitors requests regarding their data.
* You can contact us in Person, through writing to us, via phone, email or our Customer contact page on our website.
* 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 ([*https://ico.org.uk*](https://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.

1. **The Park details and Responsible Person/s**

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| Premises Name: | Birchwood Tourist Park |
| Contact Address: | Bere Road, Coldharbour, Wareham, Dorset, BH20 7PA |
| Telephone Number:  Email:  Website: | 01929 554 763  birchwoodtouristpark@hotmail.com  www.birchwoodtouristpark.co.uk |
| Responsible Persons (Data Protection Officers): | Mr J V & Mrs L Orford - Owners & Partners  Mr T J Orford & Mrs R F O Fitzgerald - Partners |
| Use of Premises: | Touring Caravan & Campsite  The Park is reached from the C7 Bere Road between Wareham/A351 and Bere Regis/A35 in Wareham Forest. Following the driveway to the brick built alarmed Shop/Reception building on the left. The shop/ reception has three door exits, a small kitchen and storage files and computers (linked to the internet), one computer is not linked to the internet and holds the old Accoman booking database, the barrier software system and electric top up system Rolec. Located near the shop there is a payphone in a red phone kiosk. The Park is gated with two barriers opened by number plate recognition and closed overnight between 10pm and 7.am. Wardens are on call each evening to deal with emergencies. They are situated near the barriers.  The area is generally level over 50 acres, mainly grass with an one-way tarmac road of half a mile from the shop/reception looping to the out barrier. At regular intervals (every 4 to 6 pitches) around the road are 11 numbered fire/ water/ refuse points. There are gravel, grass and 50 hardstanding pitches lettable to touring units bought by the customers. There are two toilet/shower brick buildings for customer use and 3 other outbuildings not within in the public areas. The Park is surrounded by Forest on three sides and the forth entrance side is open to the Games Field.  The premises are in use all year with some occupancy 24 hours a day, although less pitches are let during the winter months (Nov to Feb).  A fenced, gated storage compound has around 100 caravans and is not for public access.  Birchwood Storage Ltd operates on the Birchwood Tourist Park premises offering storage to customers of Birchwood Tourist Park. This is a limited company of Company Number 9297029, Registered in England and Wales. The Registered Office Address is Birchwood Storage Ltd, Bere Road, Coldharbour, Wareham, Dorset BH20 7PA run by two Directors Rachael F O Fitzgerald and Timothy J Orford |

1. **Marketing and Consent**

* We do not generally send marketing or advertising products directly (by post or email) to our customers and we would always provide you with choices regarding certain personal data uses, particularly around marketing and advertising.
* We contact our customers through post, email or phone should they request information, submit an enquiry or booking request directly with us, or occasionally through a third party (e.g. friend or relative or external company reserving a pitch). At the end of each season we contact Seasonal and Storage customers with details of pitch or storage details previously signed up to, to provide information and costs for the following year, as a similar product of legitimate interest.
* If we introduced a competition or newsletter we would require you to register your details with us and then we will only send you marketing communications if you opted into receiving marketing at the time and so given us your express consent (which you may withdraw at any time).

Please let us know if you do not want to receive this by opting out:

* You can ask us to stop sending you marketing messages at any time by contacting us or by following the opt-out links on any marketing message sent to you.
* If you opt out of receiving email marketing from us, we will no longer share your email address with social media platforms. However, you may continue to see our ads through them, due to their general demographic targeting. Please check the social media platforms for more detail of how to opt out from seeing these ads.
* Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or related correspondence, and we will continue to process such data in accordance with this Privacy Policy and only ever as permitted by law.

1. **Children**

To process a child’s personal data lawfully relies on consent to collect information about them from a parent or guardian. The GDPR sets the age when a child can give their own consent to this processing at 16. If a child is younger then consent from a person holding ‘parental responsibility’ is required.

* We collect personal data on children including the age bracket they fall into for pricing, and their names.

1. **Data Breaches**

**Two common types of Data Breach:**

* Significant risk to individual. Eg. Email goes to wrong person. The seriousness depends on the content of the email.

Inform the ICO within in 72 hours therefore if something goes wrong staff must tell management straight away.

* High risk to rights of individual. Must inform individual.

**The system in place if a data breach is identified:**

* The breach must be immediately be reported to the Data Protection Officer (DPO).
* The DPO should investigate, and take steps to limit the consequences of the breach. Consideration should be given as to whether to report the breach to the Information Commissioner. This should be done within 72 hours and must be done where the breach is likely to result in a significant risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant disadvantage to any individual affected. This will be done where there is a high risk to their rights and freedoms.
* Particularly serious breaches of data protection law may result in a fine. The GDPR increases the maximum fines. However, any fine is likely to be reduced where the business has made its best efforts to comply with the law.

1. **Subject Access Requests**

* You have a right to access any data we hold about you and we will deal with any subject access requests within one month. Please contact us by post or email, marking the correspondence “subject access request” and supply your name, address and email.
* You have the right to ask us to stop processing your data. Please contact us to let us know if you want us to erase, stop or amend any part of our processing and as far as we are able to (when taking into account our own legal obligations) we will do so. You have a right to be forgotten if a business doesn’t have a legitimate reason to hold the data. However a Park can decline to delete information about an individual if they have a need to hold the data. It is not an automatic right to be forgotten and legal advice maybe sought if necessary.
* If you have any complaints, you can contact us and we’ll do our utmost to get to investigate. If, after contacting our Data Protection Officer you feel your complaint has not been dealt with satisfactorily, the supervisory authority for data protection in the UK is the Information Commissioner’s Office (ICO): website at [ico.org.uk](http://ico.org.uk/).
* You have the right of portability over your data (i.e. you can ask us to pass the information we hold on you to a third party in machine readable format). This only applies to personal data an individual has provided to a controller; where the processing is based on the individual’s consent or for the performance of a contract; and when processing is carried out by automated means. Let us know if you want us to do this by contacting us.

1. **Our Website and Data Over the Internet**

* We currently use Wix.com as our website provider. Their Privacy Policy is here: *<https://www.wix.com/about/privacy?experiment_id=text_link_2_resp&utm_campaign=em_blast_marketing_notification_gdpr_16052018&utm_source=email_mkt_expert5>*
* For information on how Wix handles our site visitors' data please review sections 8, 12, and 13 of [Wix's Privacy Policy](https://www.wix.com/about/privacy) (<https://www.wix.com/about/privacy>)
* Our website includes 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 Policy of every website you visit.
* Our website links to our cloud based booking system run by GemaPark, created and supported by Netguides Ltd: “**Netguides ensure GemaPark is PCI compliant and GDPR compliant.” https://www.gemapark.co.uk/aboutus.aspx**
* Third Party Apps: used through our website, should be GDPR Compliant and the legitimate purpose of use is listed below. Cookies: are small text files that websites send to your computer to help make the interaction between users and websites faster and easier.

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| COMPANY DETAILS | CLASSIFICATION | PURPOSE |
| Facebook | Functionality | Allows the ‘Like’/ reviews/ messages/ Comments functionality |
| Twitter | Functionality | Allows the ‘Tweet’/ messages/ comments functionality |
| Instagram | Functionality | Allows photo sharing/ ‘liking’/ comments and photo functionality |
| Google | Performance | Google cookies allow us to use Google Analytics to measure web performance |
| Trip Advisor | Functionality | To allow our customers to leave reviews |
| GemaPark (Netguides) | Functionality | Allows us to collect customer contact & booking data, comments and enquiries. Booking/ pitch management, payments & invoicing, maintenance logs, reports, marketing. |
| Wix Forms | Functionality | Allows us to collect customer contact data, comments and enquiries |
| Boom Forms Creator by Boom Form | Functionality | Allows us to collect customer data for booking reservations and enquiries |

We may use third-party service providers (e.g. Facebook, Google) to serve ads on our behalf across the internet and sometimes on our website. They may collect anonymous information about your visits to our Website, and your interaction with our products and services. They may also use information about your visits to this and other Web sites to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is industry standard technology used by most major websites. No personally identifiable information is collected or used in this process as far as we are aware.

If you would like more information about this, please visit the third party service provider’s websites: [www.facebook.com/](http://www.facebook.com/) [www.google.com/](http://www.google.com/)

**Data Storage and international Transfers:**

We use Hotmail and GMail for emails, Wix as our website provider (BoomForm to collect enquiry and booking data), Accoman as our offline booking system, GemaPark (created and supported by Netguides Limited) is a cloud based booking management system, Talach for our cloud based point of sale system, Merchant services through Elavon or iZettle (for storage transactions) or SagePay (for online booking payments). We do not intentionally transfer data outside the UK, however online data storage and web-based email services mean personal data is inevitably stored on a server outside the EEA (European Economic Area). Where this occurs we rely on the specific protections in place which permit the transfer as the cloud storage or webmail provider has a robust approach to privacy. Our Park has to store some customer data in the cloud, or customer emails on a web-based server, to administer it’s booking and sales processes and so it requires the data to be stored on servers outside the EEA in some cases.

This means your data may be stored on servers outside the European economic area. These providers should comply with all legal requirements. We do not transfer your data outside the EEA for any other purpose.

Please see the individual companies Privacy Policies for more information:

### Data Security with talech. T**alech does not store any Personally Identifiable Information. PCI Compliance:** Card data read from a swipe or chip transaction are encrypted automatically by the reader and are only readable by the Merchant Services Provider / Credit Card Processor.

**Manual Keyed In:** Should a card number be manually keyed-in, the data is not stored and becomes encrypted immediately before transmission to your Processor.

* Elavon: <https://www.elavon.co.uk/cookie-policy-and-privacy-pledge.html>
* iZettle: <https://www.izettle.com/gb/privacy-policy>
* SagePay: https://www.sagepay.co.uk/policies/privacy-policy