

Welcome to the Low Steads Farm and Holiday Cottages' Privacy Notice.

Low Steads respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Low Steads collects and processes your personal data, including through your use of our website and any data you may provide when you make a booking and/or enquiry.

This website is not intended for children.

Controller

A partnership between Louise Forsyth, James Forsyth and Margaret Forsyth, trading as "Low Steads Farm and Holiday Cottages", is the controller responsible for your personal data (collectively referred to as "Low Steads", "we", "us" or "our" in this privacy policy).

Contact details

If you have any questions about this Privacy Notice or our privacy practices, please contact us in the following ways:

Low Steads Farm and Holiday Cottages

Email address: enquiries@lowsteads.co.uk

Postal address: Low Steads Farm, Longhoughton, Alnwick, Northumberland NE66 3AL

Telephone number: 01665 577623

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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 this Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated in March 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include 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.

Information about other people

Should you provide information to us about any person other than yourself, you must ensure that such third parties have been informed and understand how their personal data will be used and/or that they have given their permission for you to disclose it to us and for you to allow us to use it.

2. The data we collect 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **"Identity Data"** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **"Contact Data"** includes billing 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 bookings you have made with 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, bookings made by you, feedback and survey responses.
- **"Marketing and Communications Data"** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **"Special Categories of Personal Data"** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with accommodation). In this case, we may have to cancel a booking you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- (a) **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in booking forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - make a booking with us;
 - create an account on our website;
 - request marketing to be sent to you; or
 - give us feedback or contact us.

- (b) **Automated interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

4. How we use your personal data

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:

- (a) Where we need to perform the contract we are about to enter into or have entered into with you.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal obligation.

“Legitimate interests” means the interest of our business in conducting and managing our business to enable us to give you the best service 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).

Generally, we do not rely on consent as a legal basis for processing your personal data. If you have recently booked with us, we may rely on the “soft opt-in” exception in order to send you direct marketing communications (via email) about similar services we offer. However, where you are not an existing customer and consent is needed for direct marketing communications, we will ask for this consent separately and clearly. You have the right to withdraw consent to marketing at any time by contacting us and to “unsubscribe” from any marketing communications.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To deal with your enquiry, or to confirm and accept your booking, including managing payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to administer bookings, take payment and promote our business)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to review the standard of our customer service)
To administer and protect our business and website (including data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website,	(a) Technical	Necessary for our legitimate interests (to define types of

products/services, marketing, customer relationships and experiences		customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- (a) Service providers acting as processors who provide IT and system administration services.
- (b) Professional advisers including lawyers, accountants, bankers, and insurers.
- (c) HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We use SuperControl to manage our online booking process. We have a written contract with SuperControl to ensure that they will process your data on our behalf in compliance with all applicable data protection laws.

6. International transfers

We do not transfer your personal data outside the UK.

7. 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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on request.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Such rights include:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal

	data
To be forgotten	The right to require us to delete your personal data - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data - in certain circumstances e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object: <ul style="list-style-type: none"> - at any time to your personal data being processed for direct marketing; and - in certain other situations to our continued processing of your personal data e.g. processing carried out for the purpose of our legitimate interests.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.