

# PRIVACY NOTICE

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In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to potential customers, current customers and business partners.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

## B) TYPES OF DATA HELD

We keep several categories of personal data in order to carry out effective and efficient processes. We keep this data and we also hold the data within our computer systems, for example our Collins Booking system.

Specifically, we hold the following types of data:

- a) Personal details such as name, address, phone numbers and email address
- b) Date of bookings

## C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the process of expressing interest in visiting our beach club.

All personal data is kept in files or within the Company's computer Collins Booking system.

## D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage your purchase and to provide relevant updates on your booking.

The information below categorises the type of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Promotional Marketing	Our legitimate interests

## **E) FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for making a booking for you.

## **F) CRIMINAL CONVICTION DATA**

We will only collect criminal conviction data where it is appropriate and where the law permits us.

## **G) WHO WE SHARE YOUR DATA WITH**

Employees within our company who have a responsibility for administrating and processing to perform tasks such as those mentioned 'Activities requiring your data' . All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Your data isn't shared with third parties.

## **H) PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## **I) RETENTION PERIODS**

We only keep your data for as long as we need it for, which will be at least for the duration of your custom and interest with us though in some cases we will keep your data for a period after your custom has ended. Some data retention periods are set by the law.

<b>Record</b>	<b>Recommended Retention Period</b>
Booking confirmations	Until erasure requested

## **J) RELEVANT INDIVIDUAL RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on employee rights under GDPR.

## **K) CONSENT**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

## **L) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

**M) DATA PROTECTION COMPLIANCE**

Our appointed compliance officer in respect of our data protection activities is:

Andy Osborn  
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