

BATH CARAVAN PARK PRIVACY POLICY

We respect your privacy and are committed to protecting your personal data.

This privacy policy explains when and why we collect personal data about you when you visit this website, how this data is used and the conditions under which it may be disclosed to others.

Last updated: **07/10/2020**

1. Who we are

Who we are. We are Aquavista Watersides Limited ("**Aquavista**", "**we**", "**us**", "**our**"), a company registered in England and Wales. Our company registration number is **04930453** and our registered office is at Sawley Waterside and Marina, Long Eaton, Nottingham, NG10 3AE. Our registered VAT number is **GB3 311 5276 36**.

How to contact us. You can contact us by telephoning our customer service team at 0115 9077 444 or by writing to us at customersupport@aquavista.com or Sawley Waterside and Marina, Warren Lane, Long Eaton, Nottingham, NG103AE. We may record calls for quality and training purposes.

Aquavista is, for the purposes of data protection laws, the 'controller' of the processing of your personal data. As the controller, we decide why and how your personal data is processed and are responsible for your personal data.

2. Information we collect about you

Personal data means any information that relates to an individual that has been or could, with reasonable effort, be identified.

We may collect, use, store, transfer or otherwise process different kinds of personal data about you which we have categorised as follows:

- a) **Identity Data** including your first name, last name, title, age category of you and those in your booking and vehicle registration numbers.
- b) **Contact Data** including your billing and contact address, email address and telephone number.
- c) **Profile Data** including your email address or booking number used to login to the website, password, booking details, services purchased or transactions made by you through our website, feedback and survey responses.
- d) **Correspondence Data** including communications between us by email or by post.
- e) **Financial Data** including payment card details.
- f) **Transaction Data** including details about your booking.
- g) **Technical Data** including your internet protocol (IP) address and your login data.
- h) **Usage Data** including information about how you use our website.
- i) **Marketing and Communications Data** including 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, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

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 Data, Contact Data, Correspondence Data or Financial Data by:

- (i) making general enquiries with us;
- (ii) signing up to our newsletter;
- (iii) creating an account on our website when you make a booking with us;
- (iv) corresponding with us by post, phone, email or otherwise;
- (v) interacting with us on our social media pages;
- (vi) purchasing our services;
- (vii) entering a competition, promotion or survey; or
- (viii) giving us feedback or contacting us.

The personal data that we collect from you through direct interactions is collected voluntarily. However, if you do not provide this personal data to us, we may be unable to provide our services to you or interact or communicate with you effectively.

b) Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. See further the “Cookies” section below.

4. How we use your personal data

Data protection laws require us to rely on a specific legal reason (also known as a ‘lawful basis’) and purpose to collect and process your personal data.

The lawful bases we rely on are as follows:

a) To pursue a legitimate interest

This is where a processing activity is in our or a third party’s legitimate interest to pursue. For example, this would include our interest as a business in enabling us to give you the best services and most secure experience by analysing and improving our marketing strategy.

We make sure we consider and balance the 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 an adverse impact on you (unless we have your consent or are otherwise required or permitted to by law).

b) To perform a contract with you

This is where we process your personal data in order to perform our obligations in a contract, to which you are a party or in order to take steps at your request, before entering into such a contract, for example, personal data we process when we supply services to you.

c) To comply with a legal obligation

This is where processing your personal data is necessary for compliance with a legal obligation we are subject to; for example, processing your personal data to respond to a request you make when exercising your data protection rights.

We have set out in the table below a description of all the purposes for which we plan to use your personal data, and which lawful basis we rely on to do so.

Purpose of processing	Type of personal data	Lawful basis for processing including legitimate interest (where applicable)
To process and deliver services to you including processing your booking and taking payment	(a) Identity (b) Contact (c) Correspondence (d) Financial (e) Transaction (f) Marketing and Communications	Performance of a contract with you
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy or other policies, resolving your complaints, verifying the accuracy of your personal data and responding to your data protection rights requests (b) sending alerts and other service messages regarding the services we provide to you (c) responding to your queries and general correspondence	(a) Identity (b) Contact (c) Correspondence (d) Profile	Performance of a contract with you in respect of service messages we send to you Necessary to comply with a legal obligation in respect of our updates to our terms and policies, verifying your details and dealing with your complaints and data protection rights requests Necessary for our legitimate interests (communicating with and supporting our customers effectively) in respect of queries and general correspondence.
To enable you to participate in a prize draw, and other competitions and promotions or surveys and market research	(a) Identity (b) Contact (c) Correspondence (d) Profile (e) Usage (f) Marketing and Communications	Performance of a contract with you, in respect of competitions and promotions Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business), in respect of surveys and market research. We may use third parties to carry out surveys and market research
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Correspondence (d) Technical	Necessary for our legitimate interests (for running our business, the provision of administration and IT services, network security, to prevent fraud and in connection with business reorganisation or group restructuring)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To contact you with suggestions and recommendations about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Correspondence (d) Technical (e) Usage (f) Profile (g) Marketing and Communications	Consent to send or make communications (see below) Necessary for our legitimate interests (to ensure our marketing communications are effective and relevant to our customers) in respect of the personal data we use to tailor our marketing communications
--	--	---

Generally, we do not rely on consent as a lawful basis for processing your personal data, although we will get your consent before sending direct marketing communications to you, whether by email, text message, post or telephone. We will also not share your personal data with third parties for them to send marketing to you without first obtaining your consent.

5. **Marketing**

You have the right to withdraw your consent or otherwise opt-out of marketing at any time by doing any of the following: (a) logging into your Harbour Assist account and changing your marketing preferences; (b) using the opt-out links included in each marketing message sent to you; (c) contacting us at any time using the e-mail address provided at the end of this Privacy Policy.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any other actions you take with BWML including purchasing our services or directly interacting with us.

6. **Cookies**

We use cookies on our website for a number of different purposes. If you disable or refuse cookies whilst on our website, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, including in respect of the personal data about you that we process when using them, please see our [Cookie Policy](#).

7. **Change of purpose**

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.

8. **With whom do we share your personal data?**

We may, from time to time, share your personal data with the following third parties:

a) Booking management

We use CampManager to process bookings on our behalf. CampManager will use Identity Data, Contact Data, Profile Data and Financial Data to process your booking. As part of our ongoing monitoring and to help us improve the services we provide, CampManager (on our behalf) may disclose your Contact Data and Transaction Data to CampStead Ltd. who may contact you inviting you to complete a questionnaire regarding your stay at our park. The results of that survey will be shared with us via CampManager.

b) Partners, vendors, service providers

We engage third parties in order to obtain services, such as legal and other professional advisers, IT and cloud service providers, social media sites and trading partners.

c) Law enforcement, Government and regulatory authorities

Where we are required to disclose information and personal data in order to comply with legal and regulatory obligations including to HMRC.

d) Client service businesses

In order to help us improve the products and services we offer you, we may engage client service businesses to assist us in carrying out data collection activities, so we may better understand and identify our customer's needs.

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 service providers who process personal data on our behalf to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes, in accordance with our instructions.

9. International transfers

We may transfer your information outside of the UK and European Economic Area ("EEA"), including to the third parties listed in the section above, who may be located in countries outside of the UK and the EEA. Those countries may not have the same standards of data protection and privacy laws as in the UK.

Whenever we transfer your information outside of the UK, we ensure that your personal data is protected to the standard required under applicable data protection laws, including imposing contractual obligations on the recipients of your information or requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing. Any third parties transferring your information outside of the UK or EEA must also have in place appropriate safeguards as required under applicable data protection laws.

Please contact us using the details at the end of this notice for more information about the protections that we put in place and to obtain a copy of the relevant documents.

10. How long will be my personal data be stored?

If we collect your personal data, the length of time for which we retain it is determined by a number of factors including the purpose(s) for which we use that information and our obligations under other laws.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes that we collected it for, including the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may need your personal data to establish, bring or defend legal claims. For this purpose, we will always retain your personal data for 6 years from the end of the year in which it is no longer needed by us for any of the purposes listed above. The exceptions to this are where:

- a)** the law requires us to hold your personal information for a longer period, or delete it sooner;
- b)** you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law; and
- c)** you exercise your right to require us to retain your personal information for a period longer than our stated retention period.

11. Automated decision making

We do not envisage that any decisions that have a legal or significant effect on you will be taken about you using purely automated means, however we will update this notice if this changes.

12. Your data protection rights

Under data protection laws you have the following rights, in relation to your personal data:

a) Request access to your personal data.

This is commonly known as a "data subject access request".

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

b) Request correction of your personal data that we hold about you.

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

c) Request erasure of your personal data.

This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it.

You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

d) Object to processing of your personal data.

This right can be exercised where we are relying on a legitimate interest (or those of a third party), and there is something 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.

You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e) Request restriction of processing your personal data.

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- i) if you want us to establish the data's accuracy;
- ii) where our use of the data is unlawful but you do not want us to erase it;
- iii) where you need us to hold the data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or
- iv) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

f) Right not to be subject to a decision based solely on automated processing (including profiling).

g) Request transfer of your personal data to you or to a third party.

We will transfer to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.

h) Right to withdraw consent at any time.

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

13. Changes to this Privacy Policy

We may review this Privacy Policy from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this Privacy Policy whenever you visit our webpage or use our services. If you do not agree with any aspect of the updated Privacy Policy you should immediately notify us and cease using our services.

14. Contact us

If you have a privacy concern, complaint or a question, please contact us using the details at the beginning of this Privacy Policy.

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.