

# Privacy Notice

Last updated March 2024



## Welcome to Pure Leisure's Privacy Notice.

Pure Leisure respects your privacy and is committed to protecting your personal data and processing it responsibly. This privacy notice sets out how we, the Pure Leisure Group Limited (as a data controller) and its associated group of companies (1) ("we", "us", "our") comply with our obligations under applicable data protection law (2) and how we 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.

This privacy notice is provided in a downloadable and printable format. Alternatively contact us so we can send you a PDF copy. Please also use the glossary to understand the meaning of some of the terms used in this privacy notice.

1. Pure Leisure Group Limited, Pure Leisure Estates Limited, Pure Leisure Levens Limited, Tydd St Giles Golf and Leisure Complex Limited, Pure Leisure Lakes Limited, Bridlington Links Golf and Leisure Estate Limited, Docker Park Farm Kirkby Lonsdale Limited, Trawsfynydd Holidays Limited, Gledfield Highland Estate Limited, Coniston View Limited, JBCO Ltd, Falls of Shin Ltd, Lowther Holiday Park Limited (60% subsidiary), Highland 1 Limited, Highland 2 Limited, Highland 3 Limited, and John Charles Morphet trading as Pure Leisure (unincorporated business).

2. General Data Protection Regulation (EU2016/679) and the Data Protection Act 2018.

## Purpose of this privacy notice

This privacy notice aims to give you information on how the Pure Leisure group of companies collects and processes your personal data through your use of this website, including any data you may provide through this website, if you enquire about or purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## Contact

The Data Protection Officer has responsibility for overseeing compliance with this policy. If you have any questions about this privacy notice, including any requests to exercise your legal rights (see Your Legal Rights section below for more information), please contact the data protection officer using the details set out below:

Data Protection Officer  
Pure Leisure Group Limited  
South Lakeland House, A6  
Yealand Redmayne,  
Carnforth LA5 9RN

Email address:  
datacontroller@pureleisuregroup.com  
Telephone: 01524 781918

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](http://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 the privacy notice and your duty to inform us of changes

This version was last updated March 2024.

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

This 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 notice of every website you visit.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect and process personal data about you during the course of our relationship with you and may be through a variety of channels (via telephone, via our website, on site in one of our holiday home sites and via third parties) which we have grouped together follows:

### Identity Data

Name, maiden name, last name, username, customer number, booking reference, marital status, title, date of birth and gender. We may record your vehicle registration number at some of our parks for the purposes of safety and prevention of crime.

### Contact Data

Address, email addresses and telephone numbers.

### Financial Data

Bank account and payment card details.

### Transaction Data

Details about payments to and from you and other details of products and services you have purchased from us.

### Technical Data

Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, online behavior, operating system and platform and other technology on the devices you use to access this website. This information will be collected and stored for analytical purposes.

### Profile Data

Information provided by you in relation to your holiday home ownership or your stay to include interests, preferences, feedback and survey responses. If you are using our financing options, we will need information about your income and employment status.

### Usage Data

Information about how, where and when you use our website, products and services.

## Marketing and Communications Data

Your preferences in receiving marketing from us and your communication preferences.

### CCTV Data

Footage in which you may feature when you visit one of our premises or parks.

### Accident Data

If you have an accident whilst on our premises that you inform us of, we may record details of that accident and any injury you suffer in an accident log.

If you provide us with personal data about another person, you must ensure that before you do so, you have their agreement to do so and direct them to this Policy.

We may also collect information about you from third parties where this is relevant to our relationship with you. This includes obtaining personal data about you from our third party lenders and those third parties who provide us with contact details of individuals who are interested in purchasing a holiday home on one of our sites or booking a holiday or other related service with us.

We may require you to provide certain information to us in order to enter into and perform our contract(s) with you and to comply with our legal obligations. Except in these circumstances, your decision to provide us with personal data is generally voluntary. If, however, you chose not to provide us with certain information we may not be able to accomplish some of the purposes outlined in the policy.

## 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 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:

- (1) Where we need to perform the contract we are about to enter into or have entered into with you.
- (2) 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.
- (3) Where we need to comply with a legal or regulatory obligation.
- (4) Where necessary to protect someone's vital interests (e.g. life or death)

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Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to direct marketing via email, telephone or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a

description of all the ways we plan to 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<br>(b) Contact   | (a) Performance of a contract with you  |
| To process and deliver your order including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to us  | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to recover debts due to us)   |
| To introduce you to a lender   | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Profile   |   |
| To manage our relationship with you which will include:<br>(a) Notifying you about changes to our terms or privacy policy<br>(b) Asking you to leave a review or take a survey<br>(c) Ongoing provision of services to you | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communications<br>(e) Financial     | (a) Performance of a contract with you<br>(b) Necessary to comply with a legal obligation<br>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)  |
| To enable you to partake in a prize draw, competition or complete a survey   | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications         | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)  | (a) Identity<br>(b) Contact<br>(c) Technical  | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you   | (a) Technical<br>(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 make suggestions and recommendations to you about goods or services that may be of interest to you  | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile                            | Necessary for our legitimate interests (to develop our products/services and grow our business)   |
| To access the site and its facilities, including<br>(f) (a) Secure access<br>(g) (b) Health and Leisure facilities   | (a) Identity<br>(b) Contact<br>(c) Special Category Data  | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to ensure the safety and security of you and others)<br>(c) Legal Obligation – health and safety see <a href="http://www.HSE.gov.uk">www.HSE.gov.uk</a>   |
| Security, safety and crime minimisation<br>(d) CCTV<br>(e) Body Cams worn by security staff  | (a) Identity<br>(b) Special Category Data   | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to recover debts due to us)<br>(c) Legal Obligation (Consumer Credit Act 1974)  |
| Recording of phone calls   | (a) Identity<br>(b) Contact<br>(c) Special Category Data  | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to improve service and prevent fraud)<br>(c) Legal Obligation – fraud prevention see <a href="http://www.fca.org.uk">www.fca.org.uk</a>   |
| For carefully selected third party insurance intermediaries to provide you with information about relevant insurance services, to meet the parks licence agreement terms.  | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile                            | Necessary for our legitimate interests to ensure compliance with our park terms e.g. public liability is adequate.  |

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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you wish to amend your marketing contact preferences, please contact us to change your preferences or unsubscribe.

## Promotional offers from us

Where you have enquired about purchasing a holiday home or booking a holiday or you have purchased a holiday home or booked a holiday, we have a legitimate business interest in marketing to you to encourage new or repeat purchases.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

## Other marketing

We will get your express opt in consent before we use your personal data for any other marketing purpose or share it with any third party for marketing purposes.

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

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, warranty registration, product/service experience or other transactions.

## 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## When we may share your personal data

In some circumstances we may have to share your personal data with certain third parties, including:

- Other companies and entities within the Pure Leisure Group;
- Service providers who provide IT services, Wi-Fi, system administration, feedback, maintain and update our databases of customer details, analyse data, collate feedback, process credit card payments, provide customer service;

- Professional advisers including lawyers, bankers, auditors, insurers, banking, legal and accountancy services;
- HMRC, regulators and other authorities who require reporting or processing activities in certain circumstances;
- Finance providers in the event that you purchase a holiday home;
- To a seller or buyer in the event that we sell or buy any business or assets. In these circumstances, we may disclose personal data held by us to the prospective seller or buyer of such business or assets. If we or substantially all our assets are acquired by a third party, personal data held by us will be one of the transferred assets; and
- Other third parties to whom we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation (including in connection with a court order), or in order to enforce or apply the agreements we have with or otherwise concerning you; or to protect our rights, property or safety or those of our customers, employees or third parties.

You should be aware that, if we are requested by the police or any regulatory or government authority investigating suspected illegal activities to access and disclose personal data concerning your activities whilst using our website, we reserve the right to do so.

We also reserve the right to disclose personal data to third parties where a complaint arises concerning your use of our website, and that use is deemed by us inconsistent with the terms governing use of our website.

## 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.

## Controlling your personal information

This refers to a combination of information such as your name and contact details, that you supply to us or is supplied to us, including any information about other persons on your booking ("your information"). Your information is collected when you request information from us, contact us (and vice versa) or make a booking. You are responsible for ensuring that other members of your party are aware of the content of our Privacy Policy and consent to your acting on their behalf in all your dealings with us. We will update your information whenever we can to keep it current, accurate and complete.

Our Use of Your Information: (1) For the purpose of providing you with our services, including your accommodation, golf arrangements, etc., we may disclose and process your information outside the UK/EEA. (2) We may collect and process your information for the purposes set out in our registration with the Office of the Information

Commissioner, and disclose the same to our group companies for business purposes and also to companies and our service providers who act as "data processors" on our behalf, or to credit and fraud agencies (some of whom are located outside the UK/EEA). These business purposes include administration, providing services (and contacting you where necessary), customer care, service quality, business management and operation, re-organisation/ structuring/sale of our business (or group companies), risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences and trends, dispute resolution, credit checking and debt collection. (3) Information (such as health or religion) may be considered "sensitive personal data" under the Data Protection Act 1998. We collect it to cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data on the condition that we have your positive consent.

By booking with us you also agree for your insurers, their agents and medical staff to disclose relevant information and sensitive personal data to us in circumstances where we need to act on your behalf or in the interest of passengers or in an emergency. If you do not agree to Our Use of Your Information above, we cannot do business with you or accept your booking.

## How long will we keep your personal data

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

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 requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

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

### Request access

to your personal data (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.

### Request correction

of the 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.

### 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 continuing 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

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below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

## **Object to processing**

of your personal data 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.

## **Request restriction of processing**

of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we

have overriding legitimate grounds to use it.

## **Request the transfer**

of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right 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.

## **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.

If you wish to exercise any of the rights set out above, please contact our Data Protection Manager. 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 may 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 may 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.