

PRIVACY POLICY

Welcome to DairyLand's privacy policy.

DairyLand respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website at www.dairylandfarmworld.com (regardless of where you visit it from), when you submit an enquiry to us (whether by email or telephone), when you make a booking with us or when you visit DairyLand, and tells you about your privacy rights and how the law protects you.

This privacy policy aims to give you information on how DairyLand collects and processes data through your use of our website.

1 IMPORTANT INFORMATION

It is important that you read this privacy policy together with any other privacy policy 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 policy supplements the other notices and is not intended to override them.

This version was last updated on 23 SEPTEMBER 2019.

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.

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.

2 WHO WE ARE

DAIRYLAND FARM PARK LIMITED is the controller and responsible for your personal data (referred to as "DairyLand", "we", "us" or "our" in this privacy policy).

We are bound by applicable data protection laws in respect of the handling and collection of your personal data. DairyLand is registered as a data controller in England and Wales, with the Information Commissioner's Office (ICO) under the ICO number ZA542666.

If you have any questions about this privacy policy, including any requests to exercise your legal rights as set out in section 11, please contact us using the contact details in section 12.

3 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) or data relating to a corporate entity.

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 and visual data (photographs).
- **Contact Data** includes address and / or billing address, email address, telephone number(s) and fax number(s).
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you.

- **Technical Data** includes internet protocol (IP) address, 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.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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). Nor do we collect any information about criminal convictions and offences.

4 **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 your booking). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

5 **HOW IS YOUR PERSONAL DATA COLLECTED?**

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

- 5.1 **Direct interactions.** You may give us your Identity, Contact, Financial and Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- make an enquiry with us (whether by email or over the phone);
 - make a booking with us;
 - request marketing to be sent to you;
 - enter a survey or competition; or
 - give us some feedback.
- 5.2 **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. Where collected, we collect this personal data by using cookies and other similar technologies.
- 5.3 **Third party sources.** We may receive personal data about you from various third parties, as set out below:
- Technical Data from analytics providers such as Google based outside the EU;
 - Financial Data from payment providers such as Lloyds Cardnet; and
 - Identity, contact, financial and transaction data from third party ticketing companies.

5.4 **Photography, audio and video.** We may take photographs, or record audio or video footage of our site and any activities taking place on site. If you do not wish to be included in such material, please tell the individual responsible for taking the photographs, audio or video footage on site.

6 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:

- where we need to perform the contract we are about to enter into or have entered into with you;
- 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; or
- where we need to comply with a legal or regulatory obligation.

The types of lawful basis that we will rely on are:

- **Consent** means agreement which must be freely given, specific, informed and be an unambiguous indication of your wishes by which you, by a statement or by a clear positive action, signify agreement to the processing of personal data relating to you.
- **Legitimate Interest** 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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 (b) Contact	(a) Performance of a contract with you
To process and deliver your booking, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(c) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
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) 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) (b) Necessary to comply with a legal obligation
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 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 (b) Contact (c) Technical (d) Usage (e) Profile	Consent
Film, record and take photographs of activities taking place on our site for publicity and marketing purposes	(a) Identity	(a) Where you are incidentally included in this material, the legal basis is our legitimate interests (to market our services and develop our business). You can notify photographers if you object to being filmed, recorded or photographed. (b) Where you are specifically included and identifiable, the legal basis will be your explicit consent in the form of a media release.

6.1 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To control our use of your personal data we include unsubscribe links in every marketing communication we send out. You can also contact us to update your preferences using the details set out in clause 12.

6.1.1 Promotional Offers from Us

If you provide your express, opt-in consent, we may use your Identity, Contact, Technical, Usage and/or 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 activities we offer and which offers may be relevant for you (we call this marketing).

You may receive marketing communications from us after you have requested information from us or if you provided our third party operator with your details when you have taken a survey and, in each case, you have opted-in to receiving that marketing.

You can withdraw your consent at any time.

6.1.2 Opting Out / Unsubscribing

You can ask us or our third parties 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 a booking, enquiry or other communication or transaction with us.

6.1.3 Photography, audio and video

We may take photographs, or record audio or video footage of individuals participating our activities or when visiting our site.

We do this for the purposes of using the images and footage to promote DairyLand to a wider audience. The lawful basis on which we process such personal data is that it is necessary for the legitimate interests we have in marketing and growing the educational impact of our organisation and where applicable, consent of the individuals featured in such photographs, audio and video footage.

6.2 **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.

7 **DISCLOSURES OF YOUR PERSONAL DATA**

For the purposes set out in section 5.4, we may have to share your personal data with the following parties:

7.1 **External Third Parties** such as:

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

7.2 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

7.3 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.

8 **INTERNATIONAL TRANSFERS**

Some of our external third parties are based outside the European Union (**EU**) so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

9 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.

10 DATA RETENTION

How long will you use my personal data for?

- 10.1 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.
- 10.2 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.
- 10.3 We will generally retain our customers' data for a period of 6 (six) years after we have provided services to them, to ensure that we are able to assist you should you have any questions or feedback in relation to our services or to protect, or defend our legal rights.
- 10.4 Where we have processed your personal data to provide you with marketing communications with consent, we may contact you at least every twelve (12) months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our marketing lists (but will be added to a "do not contact" list).
- 10.5 Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with services), subject to section 10.3, we will retain your data for twelve (12) months.
- 10.6 In some circumstances you can ask us to delete your data: see section 11.1.3 below for further information.
- 10.7 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.

11 YOUR LEGAL RIGHTS

- 11.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are detailed below:
 - 11.1.1 **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.

- 11.1.2 **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.
- 11.1.3 **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 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.
- 11.1.4 **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.
- 11.1.5 **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.
- 11.1.6 **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.
- 11.1.7 **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 us directly.

11.2 **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.

11.3 **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.

11.4 **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.

12 **CONTACT DETAILS AND COMPLAINTS**

Our full details are:

Full name of legal entity: DairyLand Farm Park Ltd (trading as " DairyLand Farm World")

Company Number: 11896709

Data Privacy Manager: Communications Manager

Email address: [admin@dairylandfarmpark.com]

Postal address: DairyLand Farm World
Newquay
Cornwall
TR8 5AA

Telephone number: 01872 510246

You have the right to make a complaint at any time to the 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.