



Privacy Notice
for
Customers,
Tenants
&
Holiday Home Owners

INTRODUCTION

Welcome to our privacy notice.

We respect your privacy and are committed to protecting your personal information, which we call “personal data”. This privacy notice will tell you how we look after your personal data and about your privacy rights. It supplements any other notices and is not intended to override them.

We have tried to be brief and clear. We are happy to provide any additional information or explanation.

WHO WE ARE

Data Controller (referred to as “we/us/our”)	Hean Castle Estate
Name or title of Data Protection Manager:	Mrs Gabi Slaughter
Address:	The Estate Office Saundersfoot Pembrokeshire SA69 9AL
Telephone:	01834 813 500
Email:	Estate.office@hean-castle-estate.com

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) (www.ico.org.uk). We would appreciate the chance to deal with your concerns first.

CHANGES

This version was last updated in **May 2018** and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

HOW WE COLLECT YOUR PERSONAL DATA

You may give us data orally or by filling in forms or by corresponding with us by post, phone, email or otherwise, for example when you:

- enter into a contract with us or contact us about doing so;
- contact us about any contract we have with you;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback.

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to.

We have set out below how and why we plan to use your personal data.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you with our business	Performance of a contract with you
To perform any contract with you including: Managing payments, fees and charges Collecting and recovering money owed to us (Domestic Property Tenants Only) Notifying Utility Companies and Pembrokeshire County Council when you leave an Estate Property Addressing any breach	Performance of a contract with you Necessary for our legitimate interests to: to recover debts due to us to ensure compliance with contract terms
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy or changes to our business which are relevant to you	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests to keep our records updated
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests: to develop and grow our business
To use data analytics to improve our website, products/services, marketing, relationships and experiences	Necessary for our legitimate interests: to define types of people for our products and services to keep our website updated and relevant to develop our business and to inform our marketing strategy

PROMOTIONAL OFFERS FROM US

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you.

We may then use your personal data to send you 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 or third parties to stop sending you marketing messages at any time by contacting our Data Protection Manager.

COOKIES

For information about the cookies we use, and your ability to refuse them please refer to our separate cookie policy [See Legal page on our website <http://hean-castle-estate.com/>]

CHANGE OF PURPOSE

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

VISITORS TO OUR WEBSITE

If we want to collect personally identifiable information through our website, we will be up front about this.

When someone visits our website, we may use a third-party service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

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 notice of every website you visit.

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you do not provide personal data to us and this would prevent us from performing the contract we have or are trying to enter into with you, or place us in breach of the law, we may have to cancel our contract. We will notify you if this is the case.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with third parties to help us run our business or carry out our obligations to you:

Name	Lawful basis for processing including basis of legitimate interest
Service providers for IT and system administration	Performance of a contract with you Necessary for our legitimate interests: performing the contract, using your data as we have described in this notice
Our professional advisers including lawyers, bankers, auditors and insurers	Necessary for our legitimate interests, complying with our legal obligations
HM Revenue & Customs, regulators and other authorities	Necessary for our legitimate interests: complying with our legal obligations

We may also share your personal data with any 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 notice.

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.

INTERNATIONAL TRANSFERS

We do not transfer your data outside the European Economic Area.

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.

HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

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.

You can ask us about the retention periods for different aspects of your personal data by contacting our Data Protection Manager.

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

You have the right to:

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 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.

We do not knowingly collect data relating to children.

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.

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.

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.