

## General Data Protection Notice - Dunfield House Limited

**SUMMARY;** The processing of personal data is governed by the General Data Protection Regulation (the GDPR). **Personal data** relates to a living individual who can be identified from that data. Your personal information that you share with us is precious to us and this privacy notice informs you of how we collect, use, share, store or otherwise process that information.

**WHO WE ARE;** Dunfield House Limited is an independent group accommodation centre. We are committed to ensuring your personal information that you or others in your group share with us is safe. This policy gives you information on how your personal data is processed and for what purposes. It also explains what you can do to change the data that we hold which is individual to you.

**LEGAL BASIS FOR USING YOUR INFORMATION;** Article 6(1) of the GDPR sets out the conditions that must be met for the processing of personal data to be lawful. The most relevant grounds for using your information are;

- **With your Consent;** There are some activities where we process personal information with your consent, which you are able to withdraw from at any time, although if you do, we may not be able to provide the product or service you have requested. For example, where we want to send you marketing messages by email, we would ask your permission first and you could opt-out at any time.
- **To fulfil a Contract;** We also process your personal information in order to fulfil a contract we make with you. For example, when you book a stay with us, we will process your information to administer that stay.
- **For a Legitimate Interest;** Sometimes we may use your information to help achieve our business objectives but only where that activity doesn't negatively affect your rights. For example, we might use your information to analyse occupancy rates of our house and/or stables
- **To comply with Legal Obligations;** There may be situations where we need to use your information to comply with legal obligations. For example, we are required by law to keep records of who is in residence at Dunfield in case there is an emergency, so we can make sure you're safe. There may be times when we may have to disclose your information to third parties such as courts, the local authority or the police when legally obliged to do so
- **Special Category for Data that is more Sensitive** (under article 9), and requires greater protection, e.g. information about an individual's race, ethnic origin, religion, health, disability, sexual orientation, dietary needs being breached could mean they could be at risk of discrimination. Other categories specific to us includes **Substantial Public Interest**. The work we do is for the public interest. **Vital Interests**, e.g. if we need to call an ambulance on yours or a guest at Dunfield's behalf if they are unconscious and cannot give consent and **Legal Claims** where processing is necessary for Dunfield House Limited to exercise or defend legal claims. This allows us to share information with our legal advisors and insurance company if required.

**WHEN AND HOW DO WE COLLECT YOUR INFORMATION?** When you interact with our products and services we collect information about you and that specific interaction. Generally, this may include processing:

- Contact details when you make an enquiry to Dunfield House Limited as a group accommodation centre online, over email or on the phone
- Contact information, and preferences when we enter into a contract with you to provide a service
- Contact information when you use our website contact form
- Information about yourself or your group members on our booking forms and/or online forms to help us provide our service
- Information relating to interactions by email, text, or on social media. For example, asking questions on yours or a group members behalf, posting reviews/pictures online
- Information from customer surveys
- Indirect information when you interact with us. For example, when you visit our websites/social media, we may use analytical information which cannot be directly linked to you but helps with our business development
- We obtain sensitive information prior to your visit, for example when you tell us about yours or a group members dietary requirements, disabilities, and/or religious beliefs
- We use Information about your use of Dunfield House & Stables, and other services offered when you stay or visit us to help develop our service further. This information is not identifiable unless prior consent is given

*Please note when you provide information to us about other people in your group, you need to ensure you have their permission to do so*

## HOW WE USE YOUR PERSONAL INFORMATION

The reason we use your information will often be obvious from the information you have to give to us. For example, if you book a group into Dunfield House Limited, we would use that information to administer your stay with us. However, our uses of your information may not always be so obvious. The table below indicates key ways in how we use the information you give to us.

USE OF PERSONAL INFORMATION	LEGAL BASIS FOR PROCESSING
Provide you with the products and services you have requested, including administering your booking, responding to any enquiries, complaints or requests you may have	Consent; Legitimate Interest; To Fulfil a Contract;
To manage our relationship with you	Consent; Legitimate Interest; To Fulfil a Contract;
To process sensitive information, For example; dietary needs, dietary requirements, disabilities, sexual orientation and/or religious beliefs	Sensitive; Consent; Legitimate Interest; Legal Obligation;
Send you market research surveys	Legitimate Interest, Consent;
Tailor our service to your preferences, enabling us to personalise and enhance your stay at Dunfield where you tell us about them	Consent, legitimate Interest; To Fulfil a Contract;
Make decisions about what direct marketing to show you – For example; the House, Stables, Swimming Pool, Day training events/meals based on how you have interacted with us	Legitimate Interest;
Improve our services online and offline, including our website	Legitimate Interest;
Allow you to interact with us online and offline, in forums, on social media and elsewhere	Legitimate Interest; Consent; To Fulfil a Contract;
Monitor the use of our products and services and content	Legitimate Interest; Legal Obligation;
Verify your identity	Legitimate Interest; To Fulfil a Contract
Provide linked services, like joint promotions with partners	Consent; To Fulfil a Contract; Legitimate Interest;
Comply with legal obligations on us	Legal Obligation; Legitimate Interest;
To manage Dunfield efficiency, including regulating lighting/heating based on occupancy	Legitimate Interest;
Sending you service related communications & messages	Legal Obligation; Legitimate Interest; Consent; To Fulfil a Contract;
Send you direct marketing, where you have consented	Consent; Legitimate Interest;
Keep guests safe and ensure the security at Dunfield House & Stables	Legal Obligation; Legitimate Interest; Vital Interest
Ensure the acceptable use of our services	Legitimate Interest; Legal Obligation;
Facilitate payments	Legal Obligation; To Fulfil a Contract; Consent; Legitimate Interest;
Investigate and respond to disputes	Legitimate Interest; Legal Obligation; Consent;
Provide you with help and support where it may be required. For example, we contact you to provide assistance if you do not complete the booking process or experience technical difficulties, where we have your contact details	Legitimate Interest; To Fulfil a Contract;

**Nb;** this list covers the way in which we process data at Dunfield House Limited. Due to our desire to meet individual groups leaders aims and objectives there may be times when data collection may not meet your needs. Please do contact us if our policy requires further categories.

**SHARING YOUR PERSONAL DATA;** We are an independent company and do not share your information to anyone without your permission unless required to do so as a legal obligation. The main way in which we ask to share information on a one to one basis is when a new group leader is looking to run a similar programme to yours and we approach you to share knowledge to provide support to that new group leader. (eg; a teacher to teacher conversation) Before any sharing of information takes place an agreement will be put in place to ensure your information is protected for that one-off communication.

Your personal data will be treated as strictly confidential and is held in locked filing cabinets, password protected computers and password protected cloud-based systems. Our long-standing policy of no disclosure of your personal details to a third party without consent continues *(unless required to for legal obligations)*

**HOW LONG DO WE KEEP YOUR PERSONAL DATA?** We will retain your information for as long as necessary for the uses set out in this Policy or while there is a legitimate business reason for doing so. In exceptional circumstances we may keep information for longer periods if we have good reason to do so and if allowed under the 2018 GDPR act. Some data may be kept indefinitely if we consider it important enough for historical, research or statistical purposes. For example, someone may want to write a book about Dunfield and may share groups and organisations that have booked Dunfield.

If you ask us to delete your information before this time, we may not be able to do so for technical, legal, regulatory or contractual constraints. For example, where you wish to be suppressed from direct marketing, we would need to retain your information for this purpose.

#### **WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION HELD AT DUNFIELD?**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the Dunfield House Limited holds about you;
- The right to request that Dunfield House Limited corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Dunfield House Limited to retain such data
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by a computer
- The right to withdraw your consent for us to use your data for business and marketing purposes to you at any time
- The right to ask Dunfield House Limited to send you, or another organisation, certain types of information about you in a format that can be read by computer

#### **FURTHER INFORMATION ON HOW WE USE YOUR INFORMATION**

**DIRECT MARKETING;** We will send you email messages about an upcoming stay with us to help you plan your visit and give you and your group the best experience possible. In addition, we may send you direct marketing communications about late deals, booking opportunities for return bookings and occasional newsletters keeping you up to date with life at Dunfield.

We may also send you direct marketing while you have an ongoing relationship with us and for a reasonable time after you have visited Dunfield with your group. Direct marketing communications are sent by email and/or Mailchimp or through social media (eg; Facebook, Instagram, Twitter). You will be able to opt-out of direct marketing by following the instructions in the communications you receive.

**IMPROVING OUR SERVICE;** We may use your information to improve the services we offer our guests. For example, we may look at the preferences our guests have when they stay with us to offer more relevant service to our guests.

**LINKED SERVICES, THIRD PARTY SITES AND CONTENT;** Our website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Policy. We do not accept any responsibility or liability for other sites' privacy policies. If you access other websites using the links provided, please check their policies before submitting any personal information.

**IDENTITY VERIFICATION;** Part of our service offers group accommodation which is dependent on age or residency. Under these circumstances and in very rare occurrences we may have a legal obligation to verify relevant information if asked to do so.

**PAYMENTS;** Your information for payment for our service will not be used until a contract between us has been established. There will be rare occasions that your details may be used to verify credit details related to payments.

**DISCLOSURES REQUIRED BY LAW;** Your information will be disclosed where we are obliged by law to do so. We may also disclose your information where we are allowed by law to protect or enforce our rights or the rights of others and for the detection and prevention of crimes, such as fraud.

Our ethos of 'how good the world can be' that celebrates the worth of all people means that offensive or inappropriate content being posted by email, social media or our website will be disclosed to a third party by legal obligation by last resort if the situation cannot be settled between ourselves.

**CONTACT BY TELEPHONE;** We do not have recorded or automated telephone calls. If you contact us by phone or an online chat on our website or social media, information will only be collected that you are willing to give us.

**SOCIAL MEDIA LOGIN;** Our website provides plug-ins to social media websites, including Facebook, Twitter, Google & Instagram. If you click onto our social media sited from the website and join any of our media's, the information you have chosen to make available will be stored in that setting. Posts from those social media settings will automatically come through to you. You can monitor what you receive from us in your own social media privacy settings. We may use data stored in our social media for analysis, but we do not collect any identifiable information about you. To find out more about the reasons and extent to which social media sites collect and process your data, or to change your privacy settings, please refer to your social media provider's privacy policy.

**SALE OF OUR BUSINESS;** We have no plans to sell Dunfield! However, if we restructure or sell all or part of our business or business operations, we may transfer your information as part of that activity. Should this be the case your information will be used in accordance with this Policy unless you are notified otherwise.

**UPDATING YOUR INFORMATION;** Please ensure you keep your information up to date by contacting us if you change your email address or telephone number which is our main form of communication with you. Alternatively, you can tell us when you arrive for your booking that your information has changed, and we will update it for you.

**CONTROLLING DIRECT MARKETING;** You can change your mind about receiving direct marketing from us by opting-out of any marketing or communication you have received from us or by emailing us using the contact details below.

**REQUESTING COPIES OF YOUR INFORMATION;** You may request a copy of your personal information which we may hold about you. You may also ask us to correct any inaccuracies in your personal information. This right may be restricted by a legal obligation where disclosing information may result in the personal information of other individuals being disclosed and it would be unreasonable to do so.

**WITHDRAWING CONSENT;** Where we may rely on consent to use your information, you have the right to withdraw that consent for that processing activity at any time providing legal obligations are not compromised. If you do withdraw consent, we will not be able to provide you with the information that you have requested or may require in the future.

**OTHER RIGHTS;** You may have the right to object, erase, or restrict our processing of your information - for example, where we process your personal information because this is in our legitimate interests, you may object to this. We will carefully consider your request as there may be circumstances under our legal obligations that your request cannot be met.

**FURTHER PROCESSING;** If we wish to use your personal data for a new purpose, not covered by this data privacy notice, we will provide you with a new notice explaining how your data will be used.

**CONTACT US;** If you would like to find out more about our data privacy policy and how we use your personal data, or if you want to see a copy of the information about you that we hold, please contact **Sue Norton House Manager verbally, through our open-door office when you are staying at Dunfield or by telephone or email.** *If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or if you feel this is not possible directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>*