



SCOTTS HAVEN CAMPING AND CARAVANNING PRIVACY POLICY

GDPR 25 MAY 2018

1. Privacy Policy

- a) Here at Scotts Haven Camping and Caravanning 'Data protection' is particularly important to us. When we process our data subjects or site visitor(s) personal data, we take care and ensure that it will always be compliant with the EU General Data Protection Regulations (GDPR) and with the U.K. Data Protection Act 2018. Through this Privacy Policy and our data protection covenant, Scotts Haven Camping and Caravanning take this opportunity to inform our data subject(s) of the nature, scope and purpose of the private and personal data that we collect, use, process and share. Furthermore, we ensure that our data subject(s) are well informed; by means of this 'Privacy Policy', of the rights and freedoms which they are entitled.
- b) Scotts Haven has taken numerous measures to ensure the most rigorous protection of personal data processed through this website (www.scottshaven.co.uk) and our other channels. However, Internet/cyber based data transmissions may in principle exhibit security imperfections, thus, absolute protection may not be guaranteed. For this reason, data subject(s) are free to transfer personal data to us via alternative means, e.g. by telephone.

2. Definitions

Scotts Haven's data protection declaration is based upon the terms and definitions utilised by the European legislator for the General Data Protection Regulations (GDPR). We anticipate that our data protection declaration is legible and accessible for everyone including our data subject and business partners.

For ease of understanding the following terms will be used throughout our data protection declaration:

- a) **Consent:**
 - i. Consent by the data subject is freely given, specific, informed and considered an unambiguous indication of their wishes which they, by a statement, action or affirmation, signifies agreement to the processing, collection and use of their personal data for the purposes outlined within this declaration.
- b) **Controller responsibility:**
 - i. The Controller responsible for the processing is Scotts Haven Camping and Caravanning; who, alone or jointly with others, determines the purposes and means of the processing of personal data.
 - ii. Where necessary the purposes and means of such processing are governed by both EU and UK law.



c) Data subject

- i. A data subject is any identified or identifiable natural person, whose personal data is processed or retained by Scotts Haven Camping and Caravanning.

d) Personal data

- i. Personal data means any information relating to an identified or identifiable natural person; the 'data subject'.
- ii. An identifiable natural person is one who can be identified directly or indirectly and in particular by reference to an identifier such as a name, identification number, location data, an online identifier or to one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

e) Processing

- i. Processing is any operation which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

f) Processor

- i. A Processor is a natural or legal person, public authority, agency or other body which processes personal data. Scotts Haven may use partners and third party providers to act as processors.

g) Profiling

- i. Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

h) Anonymisation

- i. Anonymisation is the processing of personal data in a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately in a secure database.



i) Recipient

- i. A recipient is a natural or legal person, public authority, agency or another body, to whom the personal data is disclosed; whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the European Union or UK law shall not be regarded as recipients; the processing of such data by those public authorities shall be compliant with relevant data protection rules according to the nature and purposes of the processing.

j) Restriction of processing

- i. Restriction of processing is the highlighting of stored personal data so that no further processing of that data by Scotts Haven or data processors is undertaken in the future.

k) Third party

- i. A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

3. Name and Address of the controller

- a) The Controller for the purposes of the EU General Data Protection Regulation (GDPR) is:

Scotts Haven Camping and Caravanning

May Bush Lane

Soberton Heath

Hampshire

SO32 3QF

United Kingdom

Phone: +44 (0)7703 189178

Email: enquiries@scottshaven.co.uk

Website: www.scottshaven.co.uk



4. Name and Address of the Data Protection Officer

- a) A data subject may [at any time] contact our Data Protection Officer directly via email with questions concerning the protection of their personal information and private data.

Data Protection Officer

Scotts Haven Camping and Caravanning

May Bush Lane

Soberton Heath

Hampshire

SO32 3QF

United Kingdom

Phone: +44 (0)7703 189178

Email: enquiries@scottshaven.co.uk

Website: www.scottshaven.co.uk

- b) A data subject may [at any time] contact our Data Protection Officer directly via email with questions concerning the protection of their personal information and private data.

5. Cookies

- a) Scotts Haven Camping and Caravanning [website] use cookies. Cookies are text files that are stored on a computer system via an internet browser.
- b) Many internet sites, servers and devices use and store cookies. Many cookies contain a cookie ID. A cookie ID is a unique identifier of said cookie. It consists of a character string through which internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited internet sites and servers to differentiate the individual browser of the data subject from other internet browsers that contain other cookies. A specific internet browser can be recognised and identified using the unique cookie ID.
- c) Through the use of cookies, Scotts Haven can provide the users of the Scotts Haven website with more user-friendly services that may not usually be possible.
- d) By means of a cookie, the information our website can be optimised with the individual user. Cookies allow us to recognise our website users. Indeed, the purpose of this recognition is to make it easier for users to utilise our website. A website user that uses cookies does not have to enter access data each time the website is accessed as this is taken over by the website, thus, the cookie is stored on users' computer systems.



- e) Our data subject may, at any time, prevent the setting of cookies through our website by changing a corresponding setting of their Internet browser, thus, may permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via that Internet browser or other software programs. This is possible in all popular Internet browsers and is the responsibility of the individual website user.
- f) If a data subject deactivates the setting of cookies in the Internet browser some functions of our website may be deactivated.
- g) Scotts Haven Camping and Caravanning make use of both 'first party cookies' and cookies from carefully selected third-parties, such as, 'Google Analytics', 'Facebook' and 'Twitter' for analytical, tracking and remarketing purposes. All of our cookies are anonymous, containing no personally identifiable information.
- h) If you decide to share our content using social media sharing tools on our site, you may be presented with cookies from third party sites such as Facebook, Twitter or Google+. Scotts Haven does not control how these sites use cookies, therefore, you should refer to the respective site's own privacy and cookie policy to understand how they use cookies.

6. Collection of general data and information

- a) Scotts Haven website collects a series of general data and information when a data subject or automated system accesses the website. This general data and information is stored in the server log files. General data collected may be:
 - i. the browser types and versions used;
 - ii. the operating system used by the accessing system;
 - iii. the website from which an accessing system reaches our website (so-called referrers);
 - iv. the sub-websites;
 - v. the date and time of access to the Internet site;
 - vi. an Internet protocol address (IP address);
 - vii. the Internet service provider of the accessing system; and,
 - viii. any other similar data and information that may be used in the event of attacks on our information technology systems.
- b) When using such general data and information, Scotts Haven does not draw any conclusions about the data subject. Rather, this information is needed to:
 - i. deliver the content of our website correctly;
 - ii. optimize the content of our website as well as its advertisement;
 - iii. ensure the long-term viability of our information technology systems and website technology; and,
 - iv. provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.
- c) As such, Scotts Haven analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our company, and to ensure an optimal level of protection for the personal data we



process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

7. Registration on our website

- a) Our data subjects can register on our website and submit which is collected and stored and may be shared with one or more processors that also uses the data subject's personal data for an internal purpose which is attributable to the controller.
- b) When you visit our website, our web server logs your IP address. This gives us information such as which pages you looked at, whether the page request was successful or not and which browser you use to view the page. The use of this data is purely for statistical purposes and to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences internally or if we are required by law to do so.
- c) The registration of the data subject, with the voluntary submission of personal data, is intended to enable Scotts Haven to offer the data subject content or services that may only be offered to registered users due to the nature of the matter in question. Registered data subjects are free to change the personal data specified during the registration at any time, or to exercise their right to be forgotten and request their personal data be completely deleted through the right of erasure.
- d) Our website may contain links to other websites. Once you have clicked on these links please note that we do not have any control over the websites at which you will arrive. We cannot be held responsible for the protection and privacy of any information that you provide whilst visiting such sites. You should review the privacy statement applicable to the website upon arrival.

8. Direct marketing

- a) Scotts Haven may, from time-to-time, engage in direct marketing strategies whereby carefully selected data subjects are presented with tailored offers for goods or services which we believe may be of interest. Marketing communications may be sent via email our website. Data subjects are requested to specify and subscribe to this activity if they so wish and may unsubscribe at a later date.

9. Subscription to electronic communications

- a) Scotts Haven website users may be given the opportunity to subscribe to electronic communications. Scotts Haven informs its data subject regularly by means of an electronic communication about news and events that may be of interest to data subjects. The electronic communication may only be received by the data subject if:
 - i. the data subject has a valid e-mail address; and,
 - ii. the data subject registers for the electronic communication.
- b) The personal data collected as part of a registration for the electronic communication will only be used to send our electronic communications. The subscription to our electronic communications may be terminated by the data



subject at any time by using the 'unsubscribe' link on the electronic communication or via the Scotts Haven website or communicate this to Scotts Haven via alternative means, such as, telephone.

10. Data Subject Contact via the Website

- a) www.scottshaven.co.uk contains information that enables direct communication with us and includes our email address. If a data subject contacts Scotts Haven by e-mail or via a contact form, their personal data is automatically stored for processing or contacting the data subject. There is no transfer of this personal data to third parties without the data subjects consent.

11. Routine Erasure of Personal Data

- a) Scotts Haven shall process and store the personal data of the data subject only for a period necessary or as long as is granted by the European legislator or contrary to the territorial laws and regulations to which Scotts Haven is subject. If the storage purpose is not applicable or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data will be routinely erased.

12. Rights of the data subject

a) Right of access

Each data subject shall have the right granted by the European legislator to obtain from Scotts Haven Camping and Caravanning details about his/her personal data stored at any time and/or a printed copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- i. the purposes of the processing;
- ii. the categories of personal data concerned;
- iii. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- iv. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- v. the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- vi. the existence of the right to lodge a complaint with the Information Commissioner's Office which is the UK's data protection regulator.
- vii. where the personal data are not collected from the data subject, any available information as to their source; and,
- viii. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

- b) Furthermore, the data subject shall have a right to obtain information as to whether their personal data has been transferred outside the European Union to a third country or to an international organisation. Where this is the case, the data subject



shall have the right to be informed of the appropriate safeguards relating to the transfer. If a data subject wishes to avail themselves of this right of access they may, at any time, contact our Data Protection Officer via email.

13. Right to rectification

- a) Each data subject shall have the right granted by the European legislator to obtain from Scotts Haven without undue delay the rectification of inaccurate personal data concerning him/her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- b) If a data subject wishes to exercise this right to rectification, they may, at any time, contact Scotts Haven by email.

14. Right to erasure (Right to be forgotten)

- a) Each data subject shall have the right granted by the European legislator to secure from Scotts Haven the erasure of personal data concerning him/her without undue delay where one of the following grounds applies:
 - i. The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - ii. The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing;
 - iii. The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;
 - iv. The personal data has been unlawfully processed;
 - v. The personal data must be erased for compliance with a legal obligation in the European Union or UK law to which the controller is subject; or,
 - vi. The personal data has been collected in relation to the offer of information society services directly to a child, referred to in Article 8(1) of the GDPR.
- b) If one of the above reasons applies and a data subject wishes to request the erasure of personal data stored by Scotts Haven, they may, at any time, contact us by email.
- c) Where Scotts Haven made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, Scotts Haven shall, taking into account the available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of Scotts Haven will arrange the necessary measures in individual cases.

15. Right of Restriction of Processing



- a) Each data subject shall have the right granted by the European legislator to obtain from Scotts Haven restriction of processing where one of the following applies:
 - i. The accuracy of the personal data is contested by the data subject, for a period enabling Scotts Haven to verify the accuracy of the personal data;
 - ii. The processing is unlawful, and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead;
 - iii. Scotts Haven no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
 - iv. The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of Scotts Haven override those of the data subject; or,
 - v. Right to data portability

- b) Each data subject shall have the right granted by the European legislator, to receive the personal data concerning themselves, which was provided to Scotts Haven, in a structured, commonly used and machine-readable format. The data subject shall have the right to transmit such data to another controller without hindrance from Scotts Haven to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

- c) Furthermore, in exercising his/her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

16. Right to Object

- a) Each data subject shall have the right granted by the European legislator to object, on grounds relating to his/her situation, at any time, to processing of personal data concerning him/her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

- b) Scotts Haven shall no longer process the personal data in the event of an objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

- c) If Scotts Haven processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Scotts Haven processing the data for direct marketing purposes, Scotts Haven will no longer process the personal data for these purposes.



- d) In addition, the data subject has the right, on grounds relating to his/her situation, to object to processing of personal data concerning him/her by Scotts Haven for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

17. Automated Individual Decision-Making, Including Profiling

- a) Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her, or similarly significantly affects him/her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by the European Union or UK law to which the controller is subject and which also lays down suitable measures to safeguard the data subjects rights and freedoms and legitimate interests, or (3) is not based on the data subjects explicit consent.
- b) If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and Scotts Haven, or (2) it is based on the data subjects explicit consent, Scotts Haven shall implement suitable measures to safeguard the data subject rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of Scotts Haven, to express his or her point of view and contest the decision.

18. Right to Withdraw Data Protection Consent

- a) Each data subject shall have the absolute right granted by the European legislator to withdraw his/her consent to processing of his/her personal data at any time.
- b) To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact our Data Protection Officer at enquiries@scottshaven.co.uk

19. Legal basis for the processing

- a) Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If Scotts Haven is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR.
- b) In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured on site and their name, age, health data or



other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR.

- c) Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by Scotts Haven or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator who considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

20. Storage of Personal Data

- a) There are no specific minimum or maximum periods for retaining personal data. Instead, Scotts Haven Camping and Caravanning only retain personal data for the duration necessary to fulfil our obligation to our customers. As such, personal data is routinely deleted.

21. Provision of personal data as a statutory or a contractual requirement

- a) When Scotts Haven needs to process someone's personal data because we need to fulfil our contractual obligations to them, there is an obligation on the data subject to provide us with personal data. However, if the data subject decides to withhold their personal data then the contract dealings would not be concluded.

22. Description of the Special Category Data that we may Collect

- a) Generally, we do not deliberately collect 'special category data', however, at times an individual's race, ethnic origin, political or religious orientation, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life, or sexual orientation may be recorded.

23. Sharing data

- a) We may share your data with our third-party service providers and partners (processors) to enable them to contact you with products or services that relate directly to the product or service that you received from us.

24. Changes to this Privacy Policy

- a) Scotts Haven Camping and Caravanning reserve the right to amend or modify this Privacy Policy at any time. Any changes will be published on our website. Furthermore, the date of the most recent revision will appear on this web page. If we make significant changes to this policy, we may also notify you by other means such as sending an email. Where required by law, we will obtain your consent to make these changes. If you do not agree with any changes, please do not continue to use our website.