

# Security and Privacy Notice

## Boundless Breaks

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The privacy and security of your personal information is extremely important to us. Please read this privacy notice carefully, as it explains how and why we use your personal data, to make sure you stay informed, so you can be confident when you share your information with us.

The purpose of this privacy notice is to inform you on how your personal data is used here by us at boundless breaks when you make a booking to stay at our self-catering accommodation at either Cotswold Cottages, Parkergate Cottages or Treworgie Barton Cottages. Note other boundless breaks have their own privacy notices.

### 1) Who We Are

In this policy whenever you see the words 'we', 'us', 'our', or 'boundless breaks', 'Cotswold Cottages', 'Parkergate Cottages' or 'Treworgie Barton Cottages', it refers to Boundless by CSMA, a trading name of Motoring & Leisure Services, a subsidiary of the Civil Service Motoring Association Limited (registered company number 02813598) and we are authorised and regulated by the Financial Conduct Authority.

If you have any questions in relation to this privacy policy or how we use your personal data, you can contact us in any of the following ways:

- Email: [info@boundless.co.uk](mailto:info@boundless.co.uk)
- Post: Member Services, Boundless, Britannia House, 21 Station Street, Brighton BN1 4DE
- Telephone: 03301 230 374 (8am – 8pm Monday to Friday, 9am – 5pm Saturday and Sunday).

We also have a Data Protection Officer who will be happy to answer any questions or concerns you might have. You can contact him directly at [dpo@boundless.co.uk](mailto:dpo@boundless.co.uk).

### 2) Our commitment to you

The security of personal information is extremely important to us and we are committed to protecting and respecting your privacy. In this notice we aim to be honest and clear about how we handle the information we collect from you or create about you. We will detail how we collect, use and safeguard your personal information and any conditions under which we may need to share personal information.

We will also cover how information may be used for marketing and communication activities, your choices in this regard, your privacy rights and how the law protects you.

We'll never sell your personal data and will only share it with organisations we work with when it's necessary and the privacy and security of your data is assured.

We will keep this Privacy Policy updated to show you all the things we do with your personal data.

### 3) What personal data do we collect?

Personal data is any information that can be used to identify an individual personally, that is collected, stored and used by us. We'll only collect the personal data that we need, and when we do we are subject to the General Data Protection Regulation (GDPR) which applies

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across the European Union (including the United Kingdom). We are responsible for your data as a 'controller' of any personal data we collect for the purposes of those laws.

### **3a) Personal data provided by you**

This includes information you give when interacting with us, for example when you make a booking, create an online account, make an enquiry or stay at our accommodation. Data we collect includes:

- Name, address, telephone number, email address, credit / debit card details
- Name of all adults in your party and the ages of any children in your party
- If you are a boundless member, then we will also collect your membership number
- Vehicle registration and names of all people in your party
- Your comments, views and opinions regarding your experience or stay
- Name and contact details when making an enquiry
- Any special requirements

There maybe be other times that we process your information – we will inform you where you can find additional privacy notices regarding the processing of your data at the time.

There maybe be times that you provide us with additional information about a health-related matter. In these cases, we ensure that any information provided is kept secure and to a minimum and only for the period needed.

### **3b) Personal data we automatically collect**

We may automatically collect the following information from your use of the website:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our website via your mobile device we will collect your unique phone identifier.
- Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to, scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number

## **4) How we use your personal data**

We'll only use your personal data on relevant lawful grounds as permitted by the Data Protection Act 2018, GDPR and the Privacy of Electronic Communication Regulations 2003, and any successor legislation to these.

Under these data protection laws, we can only use your personal data if we have a proper reason for doing so, such as:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

If we are asked by the police, law enforcement agency or any other regulatory or government authority investigating suspected illegal activities, we may need to disclose and exchange information with that authority to comply with our legal and regulatory obligations.

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Below are the key reasons that we may process your data:

Ref	Personal Data	Point of Collection	Purpose of processing	Lawful Basis
a	<b>Contact details:</b> Name, address, email address, telephone number	When making a booking Creating an online account Checking in	<ul style="list-style-type: none"> <li>- Communicate with you in regard to a booking, manage reservations, accommodation requests and other hotel services</li> <li>- Manage your stay with us</li> </ul>	Carrying out our contractual obligations
b	<b>Payment details:</b> Credit / Debit card details	Making a reservation Use of facilities	<ul style="list-style-type: none"> <li>- Manage your reservation, accommodation re-quests</li> <li>- Complete your check-in/ check-out, process payments</li> <li>- Process facilities payments throughout the park for facilities.</li> </ul>	Carrying out our contractual obligations
c	<b>Booking details:</b> Arrival / departure dates, accommodation details	When making a booking	<ul style="list-style-type: none"> <li>- Manage your booking and your stay with us</li> </ul>	Carrying out our contractual obligations
d	<b>Vehicle details:</b> Vehicle registration number	When making a booking	<ul style="list-style-type: none"> <li>- Manage our car parking facilities</li> <li>- Combat unauthorised parking</li> </ul>	Carrying out our contractual obligations
e	<b>Ages of children in your party</b>	On completion of a registration card upon arrival	<ul style="list-style-type: none"> <li>- In case of emergency</li> <li>- To ensure suitable accommodation is provided</li> </ul>	Not applicable - no personal data re-garding children will be collected.
f	<b>Contact Details:</b> Name, email address	Your questions and comments or complaints you make about our hotel	<ul style="list-style-type: none"> <li>- Collect feedback about the service we have provided</li> <li>- Make improvements and monitor customer experience</li> </ul>	Legitimate Interest
g	<b>Name, email address</b>	If you opt in to receive emails at time of booking	<ul style="list-style-type: none"> <li>- To send updates by email about special offers, news and events form boundless breaks</li> </ul>	Consent – you can unsubscribe or opt out at any time
h	<b>Contact Details:</b> Name, contact details	Making a general enquiry	<ul style="list-style-type: none"> <li>- To respond to your requests</li> </ul>	Legitimate Interests
i	<b>Boundless membership number</b>	At time of booking	<ul style="list-style-type: none"> <li>- To validate membership</li> </ul>	Carrying out our contractual obligations
j	<b>Health related information</b>	At time of booking you may choose to provide us with additional information	<ul style="list-style-type: none"> <li>- To ensure we are aware of any special health or medical details that may mean we need to pre-prepare a Personal Emergency Evacuation Plan.</li> </ul>	Legal Obligation
k	<b>Name, requirement of health issues</b>	This will be discussed on arrival	<ul style="list-style-type: none"> <li>- If a personal evacuation planned has been deemed necessary</li> </ul>	Legal Obligation
l	<b>Member status, usage data, technical data (eg IP address) when on our website</b>	When using our website	<ul style="list-style-type: none"> <li>- To deliver relevant website content and advertisements and measure the effectiveness of advertising</li> </ul>	Consent – this is through our cookie consent
m	<b>Email address</b>	When using our website	<ul style="list-style-type: none"> <li>- To utilise digital platforms such as Google ads for marketing purposes</li> </ul>	Consent – you can opt out at any time
n	<b>Technical and usage data</b>	When using our website	<ul style="list-style-type: none"> <li>- To use data analytics to improve our website, marketing</li> </ul>	Legitimate interest

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## 5) Updating your data and marketing preferences

We want you to remain in control of your personal data. If at any time, you want to update or amend your personal data or marketing preferences please contact us in the following ways:

Call Boundless: **03301 230 374** Phone lines open 8am – 8pm Monday to Friday and 9am – 5 pm Saturday and Sunday. Calls may be monitored and recorded for training purposes.

Write to: Member Services, Britannia House, 21 Station Street, Brighton, BN1 4DE

Email: [info@boundless.co.uk](mailto:info@boundless.co.uk)

Verification, updating and amendment of personal data will take place within 30 days of receipt of your request.

To unsubscribe from marketing emails, simply click on the unsubscribe link that can be found at the bottom of all our marketing email communications.

## 6) Cookies and our Website

Cookies are small text files stored on your computer when you visit certain websites. We use first party cookies (cookies that we have set, that can only be read by our website) to personalise your online experience. We also use third party cookies (cookies that are set by an organisation other than the owner of the website) for the purposes of website measurement and targeted advertising. You can control the use of cookies inside your browser settings. Further information can be found in our cookie policy.

## 7) Keeping your personal data

We will only use your information for as long as it is required for the purpose it was collected for. If we collect your personal information, the length of time we retain it is determined by a number of factors, including the purpose for which we use that information and our obligations under other laws.

We will retain your data for 7 years in accordance with the Limitation Act 1980. This acts states either you or we may bring a claim for breach of contract within six years of the event giving rise to a breach. In order that we may defend or bring a breach of contract claim (and to comply with disclosure requirements) we keep your account record for 7 years. This period takes into account the 4-month period during which a claim form, issued on the last day of the limitation period, remains valid for service and for any extension for service which may be granted by the court.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

If you have an online account that has not been used for more than 18 months, the account will be deleted.

If a PEEP (personal emergency evacuation plan) has been created, we will retain a paper and electronic copy of this for 3 years. If a PEEP is in relation to a child, then it will be retained until the child is 18 years old and a further 3 years after that. This is to meet our legal obligations under Health & Safety at Work Act 1974, Regulatory Reform Order 2005.

## 8) How we secure your data

We maintain physical, electrical and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable information. We have taken technical and organisational measures to secure your data, including:

- This website has a secure <https://> address (URL). This means that a SSL certificate is in place so that if you submit any data via the website, then your information is encrypted whilst it is being transmitted to the applicable database or email server
  - We limit access to your personal data to those who have a genuine business need to access it. Only employees who need the information to perform a specific job are provided with access to your data. Those processing your data will do so only in an
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authorised manner and are subject to a duty of confidentiality. Contracts will be in place to protect any personal data.

- All our staff complete mandatory information security and data protection training on employment and annually thereafter to reinforce responsibility and requirements set out in our information security policies.
- We conduct Privacy Impact Assessments in accordance with Data Privacy guidelines
- We implement appropriate measures and controls, including monitoring and physical measures, to the processing and storage of data.
- We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
- We require, through the use of contract and security reviews, our third party vendors and providers to protect any personal information with which they are entrusted in accordance with our own policies and procedures

## 9) Disclosing your information to third parties

When we allow third parties acting on behalf of Boundless to access your information, we will always have complete control of what they see, how long they see it and what they are allowed to do with it by imposing strict contractual obligations on them such as data sharing agreements. We do not sell or share your personal information for other organisations to use.

Personal data collected and process by us may be shared with the following groups where necessary:

- Boundless employees and any on-site staff
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website.

Also, under strict controlled conditions:

- Contractors
- Service providers providing services to us
- Advisors
- Agents
- Auditors

We may also disclose your personal information to third parties if we are under the duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or cookie policy and other agreements; or to protect the rights, property, or safety of Boundless, our members, volunteers and employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

## 10) Where your personal data is held

Your personal data is primarily held in our boundless breaks booking system called gemapark, which is provided by Netguides Limited, whose systems are located in the UK. Under the GDPR they act as a processor and we remain the controller of your data. In addition, your data may be held at our boundless break sites, third party agencies, services providers, representatives and agents as described above. All systems are cloud based with servers located within the European Economic Area and we do not pass your information outside of the EEA.

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## 11) Your rights

You have the following rights, which you can exercise free of charge:

<b>Access</b>	The right to be provided with a copy of your personal information (the right of access)
<b>Rectification</b>	The right to require us to correct any mistakes in your personal information
<b>To be forgotten</b>	The right to require us to delete your personal information—in certain situations
<b>Restriction of processing</b>	The right to require us to restrict processing of your personal information—in certain circumstances, for example, if you contest the accuracy of the data
<b>Data portability</b>	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
<b>To object</b>	The right to object: <ul style="list-style-type: none"><li>– at any time to your personal information being processed for direct marketing (including profiling);</li><li>– in certain other situations to our continued processing of your personal information, for example, processing carried out for the purpose of our legitimate interests.</li></ul>
<b>Not to be subject to automated individual decision-making*</b>	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
<b>Right to withdraw consent</b>	If you have given us your consent to use your personal information, you can withdraw your consent at any time. This might impact our ability to provide goods and services to you

\* We do not use any personal data for any automated decision making or profiling.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- Send a written request by either email or letter to our Data Protection Officer (please see 'who are we')
- email, call or write to our Data Protection Officer (please see 'who are we')
- let us have enough information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## 12) How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: **0303 123 1113**.

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### 13) Changes to this privacy notice

We'll amend this privacy notice from time to time to ensure it remains up to date and reflects why we collect and use your personal data. Please visit our website to keep up to date with any changes. The current version will always be posted on our website – [www.boundlessbreaks.co.uk](http://www.boundlessbreaks.co.uk)

### Do you need extra help?

If you would like this notice in another format (for example, large print or braille), please contact at [info@boundless.co.uk](mailto:info@boundless.co.uk) or telephone: **03301 230374**