



# L&J Leisure Ltd trading as Briarfields Hotel, The Lodge, Norfolk Coast Holiday Cottages

### 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data.

L&J Leisure Ltd, are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

The website addresses: <a href="www.briarfieldshotelnorfolk.co.uk">www.briarfieldshotelnorfolk.co.uk</a>; <a href="www.norfolk-notels.co.uk">www.norfolk.co.uk</a>; <a href="www.norfolkcoastholidaycottages.co.uk">www.norfolk.co.uk</a>; <a href="www.norfolkcoastholidaycottages.co.uk">www.norfolk.co.uk</a>; <a href="www.norfolkcoastholidaycottages.co.uk">www.norfolk.co.uk</a>; <a href="www.norfolkcoastholidaycottages.co.uk">www.norfolk.co.uk</a>; <a href="www.norfolkcoastholidaycottages.co.uk">www.norfolkcoastholidaycottages.co.uk</a> (herein referred to as the websites) are the property of L&J Leisure Ltd.

### 2. NAVIGATION DATA HANDLING

You are hereby informed that the websites use cookies. A cookie is a piece of information that is stored to the user's hard drive by visiting a website in a HTTP cookie file. The website uses session cookies to identify the user and track the user's identification status. Session cookies are automatically erased from the hard drive when the session is terminated. Cookies are also used to collect anonymous statistical data to analyze the ways in which a visitor uses the website with the goal of improving it. Only the following information about website users is collected and stored: a) The internet service provider (ISP) domain name and/or IP address providing internet access. For example, a user from provider xxx will only be identified by the domain name xxx.uk and/or the IP address. This information is used to develop a statistical analysis of the countries or servers that most frequently access the website.

- b) The date and time of the user's latest access of the website. This information aids in identifying the site's peak traffic hours and allows for adjustments to avoid overload.
- c) The internet address hosting the link to the website. With this piece of data, the effectiveness of banners and links to the server shall be monitored and those with the best results offered.
- d) The number of daily visitors to each section. This information reveals the most popular areas of the website and allows the website owners to improve and upgrade the content of those sections, thereby increasing user satisfaction.

By collecting this data, the following information can be obtained:

- a) The date and time of the user's last visit to the website.
- b) The content design chosen by the user.
- c) The security elements in the access control of restricted areas.

The user has the option to not accept cookies or to be informed of their settings by enabling them in their browser accordingly. Nonetheless, disabling cookies may limit the full functionality of the website available to the user.

Our email addresses are  $\underline{info@briarfieldshotelnorfolk.co.uk}$ ;  $\underline{info@norfolkcoastholidaycottages.co.uk}$ 

Our Head Office postal address is L&J Leisure Ltd, Driftwood Lodge, 36a Old Hunstanton Road, Old Hunstanton, Norfolk PE36 6HS.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at <a href="mailto:info@briarfieldshotelnorfolk.co.uk">info@briarfieldshotelnorfolk.co.uk</a>; <a href="mailto:info@briarfieldshotelnorfolk.co.uk">info@briarfieldshotelnorfolk.co.uk</a>; <a href="mailto:info@norfolkcoastholidaycottages.co.uk">info@norfolkcoastholidaycottages.co.uk</a>

## Sensitive Data

We do not collect any sensitive data about our customers. Sensitive data refers to data that 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. We do not collect any information about criminal convictions and offences.

# 2. HOW WE USE YOUR PERSONAL DATA



We will only use your personal data when legally permitted. The most common uses of your personal data are:

- 1. Where we need to perform the contract between us.
- 2. 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.
- 3. Where we need to comply with a legal or regulatory obligation.

If you have booked accommodation to stay at one of our hotels or holiday rental properties, this gives us a legitimate reason to hold data on you as part of a contract we have to hold and pay for the booking. Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email. You have the right to withdraw consent to marketing at any time by emailing us at <a href="mailto:info@briarfieldshotelnorfolk.co.uk">info@briarfieldshotelnorfolk.co.uk</a>; <a href="mailto:info@norfolkcoastholidaycottages.co.uk">info@norfolkcoastholidaycottages.co.uk</a> or unsubscribing from the communication.

Purposes for processing your personal data:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity	Performance of a contract with you
	(b) Contact	
To process and deliver your hotel	(a) Identity	(a) Performance of a contract with you
booking including:	(b) Contact	(b) Necessary for our legitimate interests to
(a) Manage payments, fees and charges	(c) Financial	recover debts owed to us
(b) Collect and recover money owed to	(d) Transaction	
us	(e) Marketing and	
c) registration document when arriving	Communications	
at the hotel	f) Nationality	
To manage our relationship with you	(a) Identity	(a) Performance of a contract with you
which will include:	(b) Contact	(b) Necessary to comply with a legal obligation
(a) Notifying you about changes to our	(c) Profile	(c) Necessary for our legitimate interests to keep
terms or privacy policy	(d) Marketing and	our records updated and to study how customers
(b) Asking you to leave a review or take	Communications	use our products/services
a survey		
To enable you to partake in a prize	(a) Identity	(a) Performance of a contract with you
draw, competition or complete a survey	(b) Contact	(b) Necessary for our legitimate interests to keep
	(c) Profile	in touch with our customers, develop our
	(d) Usage	product and grow our business
	(e) Marketing and	
	Communications	
To administer and protect our business	(a) Identity	(a) Necessary for our legitimate interests for
and our site (including troubleshooting,	(b) Contact	running our business, provision of administration
data analysis, testing, system	(c) Technical	and IT services, network security, to prevent
maintenance, support, reporting and		fraud and in the context of a business
hosting of data)		reorganisation or group restructuring exercise
		(b) Necessary to comply with a legal obligation
To deliver relevant content and	(a) Identity	Necessary for our legitimate interests to study
advertisements to you and measure and	(b) Contact	how customers use our products/services, to
understand the effectiveness of our	(c) Profile	develop them, to grow our business and to
advertising	(d) Usage	inform our marketing strategy
	(e) Marketing and	
	Communications	
	(f) Technical	

To use data analytics to improve our	(a) Technical	Necessary for our legitimate interests to define
website, products/services, marketing,	(b) Usage	types of customers for our products and services,
customer relationships and experiences		to keep our site updated and relevant, to develop
		our business and to inform our marketing
		strategy
To make suggestions and	(a) Identity	Necessary for our legitimate interests to develop
recommendations to you about goods	(b) Contact	our products/services and grow our business
or services that may be of interest to	(c) Technical	
you	(d) Usage	
	(e) Profile	

## Marketing communications

From time to time we like to update guests with information about what is happening at the hotels or our holiday cottages and with seasonal offers. Therefore, you will receive marketing communications from us if you have:

- 1. stayed at the hotel or a holiday cottage
- 2. requested information from us
- 3. signed up to our newsletter and offers on our website
- 4. if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- 5. in each case, you have not opted out of receiving that marketing.

We will NOT share your personal data with any third party for marketing purposes.

You can ask us to stop sending you marketing messages at any time by emailing us at <a href="mailto:info@briarfieldshotelnorfolk.co.uk">info@briarfieldshotelnorfolk.co.uk</a>; <a href="mailto:info@norfolkcoastholidaycottages.co.uk">info@norfolkcoastholidaycottages.co.uk</a> or unsubscribe at the bottom of the marketing email.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of us forming a contract with you by way of a hotel or cottage booking or service

# 3. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 2 above:

- 1. Service providers who provide IT and system administration services.
- 2. Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- 3. HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- 4. Third parties to whom we sell, transfer, or merge parts of our business or our assets. This includes our data processing providers and email marketing software provider

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions. These third-party providers hold their own processing agreements and are GDPR compliant, even though some might have their servers outside the EEA.



### 4. 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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

#### 5. DATA RETENTION

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

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.

#### 6. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 1. Request access to your personal data.
- 2. Request correction of your personal data.
- 3. Request erasure of your personal data.
- 4. Object to processing of your personal data.
- 5. Request restriction of processing your personal data.
- 6. Request transfer of your personal data.
- 7. Right to withdraw consent.

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, please email us <a href="mailto:info@briarfieldshotelnorfolk.co.uk">info@briarfieldshotelnorfolk.co.uk</a>; <a href="mailto:info@briarfieldshotelnorf

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 6 weeks.