



## The Grange Country Park Privacy Policy

The Grange Country Park respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### **Important information and who we are**

Purpose of this privacy notice

This privacy notice aims to give you information on how The Grange Country Park collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

The Grange Country Park is the controller and responsible for your personal data (collectively referred to as "The Grange", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### **Contact details**

Our full details are: The Grange Country Park

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

Postal address: The Grange Country Park, Rotherfield Road, Crowborough, East Sussex, TN6 2XD

## **1.1 Information we may collect from you**

**1.1** Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

**1.2** We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name and title.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

**1.3** We use different methods to collect data from and about you including through:

**1.3.1** Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

**1.3.2** This includes personal data you provide when you:

- sign up to receive The Grange newsletter

- make enquiries or request information be sent to you;
- filling out forms on our website;
- completing a personal information sheet
- ask for marketing to be sent to you;
- purchasing tickets
- engage with us on social media;
- enter a competition, promotion or survey;
- contact customer services; or
- leave comments or reviews on our products or services (please be kind!).

**1.3.3** Automated technologies or interactions. As you interact with us, including via the The Grange Country Park website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts (including those shown on third party websites).

**1.4** Details of occasions on which you contact us;

**1.5** Details of transactions you carry out through the Website or contacting our offices and of the fulfilment of your orders; and

**1.6** Details of your visits to the Website or contacting our offices by post, phone, email or otherwise.

**1.7** We do not collect any Special Categories of Personal Data about you (this 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). Nor do we collect any information about criminal convictions and offences.

**1.8** We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

**1.9** If you fail to provide personal data

**1.9.1** Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 2. Your Consent

**2.1** By using the Website and/or Contacting our offices and submitting information, you consent to:

**2.1.1** The collection and use of your personal data by us as described in section 1 above; and

**2.1.2** The sharing of your personal data with third parties strictly in accordance with section 6 below

## 3. How we use your information

We use information held about you in the following ways:

**3.1** To process your application to buy tickets or to register with us;

**3.2** To identify you and authenticate your use when you visit the Website or telephone, email our offices:

**3.3** To provide you with information about products and services related to The Grange and any of our other products and services and any special offers and any features of the Website which we think may be of interest to you unless you inform us that you do not wish to receive such messages (please also refer to section 8 below);

**3.4** For marketing third party products and services to you, provided you have consented for us to do so (for example by ticking the relevant box(es) when you register or make a booking on the Website)

**3.5** To ensure that content from the Website is presented in the most effective manner for you and

your computer;

**3.6** To notify you about changes to our products and/or the Website; and

**3.7** To help diagnose problems with our server and to administer the Website; (together the "Purposes").

**3.8** Answer your enquiries which may involve contacting you by post, e-mail or phone

**3.9** Arrange for the delivery of your prize if you have won a competition

**3.10** To send out any invoicing or statements

## 4. IP Addresses and Cookies

**4.1** We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

**4.2** For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve the Website and to deliver a better and more personalised service. They enable us to:

**4.2.1** Estimate our audience size and usage pattern;

**4.2.2** Store information about your preferences, and so allow us to customise the Website according to your individual interests;

**4.2.3** Speed up your searches; and

**4.2.4** Recognise you when you return to the Website.

**4.3** You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

**4.4** Please note if we carry any external advertising on the Website or have sponsors, that they themselves may also use cookies over which we have no control.

## 5. Where your personal data may be stored

**5.1** Information you provide to us directly is stored on our secure servers.

**5.2** Any payment transactions through our website will be encrypted using SSL technology.

**5.3** Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

**5.4** Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 6. Information disclosure to third parties

**6.1** We may disclose your personal information to third parties in the following circumstances only:

**6.1.1** For marketing purposes provided always that you have consented to us sharing such data with third parties by notifying us via the Website (e.g. by ticking the relevant box(es) when you register or in other communications with us);

**6.1.2** To service providers who manage aspects of our operations (for example third parties who provide technical services to the Website) in connection with the Purposes;

**6.1.3** If our company or substantially all of its assets is or are acquired by a third party, in which case personal data held by us about you and any other users of the Website or Customer Services will be

one of the transferred assets;

**6.1.4** If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Website Terms of Use or the Tickets Terms and Conditions for ticket purchases; or

**6.1.5** To protect our rights, property, or safety and those of other visitors to Stonham Barns or Website users (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

**6.2** In the event that our company or substantially all of its assets is or are acquired by a third party, you agree that such third party may use and process your data for the Purposes unless you have provided a notification to us in accordance with section 14 below.

## 7. Links to other Websites

**7.1** The website may contain links to other websites which may be owned and operated by third parties. If you choose to use the services provided by those websites, you may be asked by those sites to provide certain personal information. Stonham Barns is not responsible for the privacy practices of those websites although its name or logo may appear on those websites. Please read the privacy statements of each and every website that you visit.

## 8. Unsubscribe Information

**8.1** You have the right at any time to ask us not to use your personal data for marketing purposes. If you do not wish to receive such communications, please contact us at [info@thegrangecountrypark.co.uk](mailto:info@thegrangecountrypark.co.uk)

## 9. International Transfers

**9.1** We do not transfer your personal data outside the European Economic Area (EEA).

## 10. Security

**10.1** The security of personal data is important to us. We maintain appropriate administrative, technical and physical safeguards to protect personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access, use and all other unlawful forms of processing of the personal data in our possession.

**10.2** You are responsible for your information on the Internet. Make sure that you are careful when you visit our sites in a public place like an Internet cafe. We can only be responsible for your information when it is received on our computers not whilst it is in any intermediate environment.

## 11. Data Retention

**11.1** How long will you use my personal data for?

**11.2** 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.

**11.3** 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.

**11.4** 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.

## 12. Your Legal Rights

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

**12.2** 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.

**12.3** 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.

**12.4** 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.

**12.5** 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.

**12.6** 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.

**12.7** 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.

**12.8** 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.

**12.9** If you wish to exercise any of the rights set out above, please contact us.

## 13. No fee usually required

**13.1** 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.

**13.2** What we may need from you

**13.2.1** 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.

**13.3** Time limit to respond

**13.3.1** 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.

**13.4** Your duty to inform us of changes

**13.4.1** It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 14. How to contact us about privacy

**14.1** To find out more about how your data will be used, to make a complaint or to change any information or preferences you have provided to us please contact us at [info@thegrangecountrypark.co.uk](mailto:info@thegrangecountrypark.co.uk)

## 15. Ticket purchase privacy policy

**15.1** During the use of the advanced ticket link, the User shall provide personal and other data to Eventbrite. This personal and other data shall be stored and processed in accordance with applicable legislation, and not provided to third parties without prior consent unless Eventbrite is legally required to do so, or in defence of its rights.

**15.2** For Stripe we only store the tokens required to identify the transaction with Stripe, issue refunds and identify transactions made using Stripe.

## 16. E-newsletter

**16.1** We use a third-party provider, Mailchimp, to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear graphs to help us monitor and improve our e-newsletter.

## 17. People who email us

**17.1** We monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## 18. People who contact us via social media

**18.1** If you send us a private or direct message via social media the message will be stored in our own Live Promotions Facebook, Twitter, Instagram and Linked In profiles. It will not be shared with any other organisations.

## 19. Search Engine

**19.1** Our website search and decision notice search is powered by Google Adwords. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either Live Promotions Events or any third party.

## 20. Changes to our privacy policy

**20.1** Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

**20.2** Your continued use of the Website after any such changes will constitute your acceptance of the updated Privacy Policy. If you do not wish to accept the revised Privacy Policy, you must not use or access (or continue to use or access) the Website. It is your responsibility to regularly check the Website to determine if the Privacy Policy has been updated and to review those changes before deciding whether or not to access (or continue to access) the Website.

**20.3** This privacy policy was last updated on 25<sup>th</sup> May 2018

