# **Privacy Policy**

#### **IMPORTANT - PLEASE READ CAREFULLY**

Cool Contours is committed to respecting the privacy rights of users to its website and social media platforms. This privacy policy ("Policy") explains how we collect, store, and use your personal data when you fill out the forms on our website or contact us. These terms will apply regardless of how the Site is accessed and will cover any technologies or devices by which we make the Site available to you. We take every care to protect your personal data and your privacy during this process in accordance with all relevant legislation. There are steps you can take to control what we do with your personal data, and these are explained in the policy.

This Policy provides you with details about the types of personal data that we collect from you, how we use your personal data and the rights you have to control our use of your personal data. You will find specific details about our processing purposes below.

You must read this privacy policy carefully and we recommend that you print and retain a copy for your future reference. By browsing or otherwise using this Site, you must have read this Policy.

When we say "Cool Contours", "us", "our" or "we" in this Policy, we are referring to Cool Contours, this is a business which is part of the partnership 'Warden Farms'.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679, the "GDPR"), Cool Contours is the "data controller" (as defined in the GDPR) of the personal data, when it determines the purposes and means of the processing of personal data.

#### In addition, under the GDPR:

- 'personal data' means any information relating to you and that identifies you, directly or indirectly:
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data.

#### Who is responsible for your personal data:

Cool Contours (Warden Farms) is responsible for your personal data. Our registered address is Cool Contours Venue, Warden Hill Farm, Chipping Warden, Banbury OX17 1AJ. We are the data controller of the personal data which we collect from you, and so we are responsible for the ways your personal data are collected and the purposes for which your personal data are used.

#### How we protect your personal data:

We use technical measures such as encryption and password protection to protect your data and the systems they are held in. We also use operational measures to protect the data, for example by limiting the number of people who have access to your personal data.

### What personal data we collect from you

Depending on how you use our services, we may collect any of the following personal data from you:

Type of personal data	Places where these may normally be collected	
Your name and contact details (email address, telephone number, address)	When you make a booking or reservation (including via 3rd party e.g. AirBnB)  When you make an enquiry and/or complete a form  When you enter a competition  When you purchase a gift voucher  When you fill out a feedback form	
Information about your activity with us	When you make a booking or reservation  When you make an enquiry or complete a form	
Names of fellow guests, including the age of any children	When you make a booking for people other than yourself	
Communication we have with you (emails, letters, telephone calls, messages sent to us, feedback)	When you get in touch with us  When you respond to our requests for feedback	
Payment card details	When facilitating payment by card	

We may also collect limited amounts of more sensitive personal data in order to provide certain services to you:

- You may give us information about any allergies or other special requirements you have
- We may collect more sensitive information if you have had an accident during your stay/hire of the venue.

Please see the information below on how we use and protect all of your personal data, including sensitive data.

#### How we use your personal data:

We can only use your personal data if we have a valid reason (or "lawful basis") for doing so. The law defines a number of possible reasons, of which the following four apply to our use of your data:

• To fulfil a contract we have with you

- When you consent to it
- If we have a legal obligation to use your data for a particular reason
- When it is in our legitimate interests

In cases where we have chosen "legitimate interests", we will give you further information on what these interests are and why the processing of your data is necessary to achieve this. If we choose this basis, we will have ensured that we have balanced our interests against yours and believe that you would reasonably expect us to use your data in this way.

You can find detail on the different ways in which we use your personal data, and the reasons for doing so, below.

What we use your personal data for	Lawful basis	Our legitimate interests
To respond to your enquiries or requests	Legitimate Interests	As you have made an enquiry with us, we need to respond to this enquiry
To process any reservations or bookings you may have with us; before and during your stay	Contract	Not applicable
To give you further information about any reservations, bookings or subscriptions you may have with us	Legitimate Interests	We want you to have the best possible experience
To send you requests for feedback on your experience with us	Legitimate Interests	We continually strive to improve our services and need your input to do so
To inform you about our news and offers that we think you might be interested in	Consent  Legitimate interests	We think you will be interested in offers that are similar to what you have previously purchased with us, you can opt-out at any time.
To meet certain legal responsibilities, e.g., collecting registration data or cooperating with police	Legal obligation	Not applicable
To combat fraud and manage risk for us and our customers	Legitimate interests	We need to protect our business and our customers
To respond to complaints and to seek to resolve them, including refunds where appropriate.  To investigate accidents and prevent them from happening in the future.	Legitimate interests	We want to resolve complaints as best we can. We also want to improve processes and service levels for the future.

How we use your personal data to personalise your experience

We use the data we collect about you from different sources to try to understand more about you and your preferences, so that we can personalise your experience. We use data that you have directly given to us (such as through reservations or enquiries).

#### How we work with Third Partys:

We use a number of Third Party systems to collect and process your data for the purposes shown above. This includes our website (which is hosted by Squarespace), our reservation systems, our payment system providers. We ask that they follow the same rigorous data protection standards that we do.

We collect personal data from Third Party agents who process reservations or other information on our behalf. Examples of this include AirBnB.

We will never sell, rent, loan or share your personal data with a third party for the purpose of marketing activity of any nature.

#### How long we keep you data:

We only keep your data only for as long as we need it. How long we need data depends on what we are using it for, as described above.

We will actively review the personal data we hold and when there is no longer a need for us to hold it, we will either delete it securely or in some cases anonymise it.

We aim to destroy any paper copies of your personal data as soon as they have served their purpose (e.g., once information has been entered into a system). In the cases where we need to keep paper copies for longer, we ensure that they are stored securely, and access is limited.

## Your rights:

You have a number of rights with regard to your data, which include:

- The right to access your data
- The right to rectify your data, if you believe there is an error such as the spelling of your name
- The right to delete your data or restrict their use
- The right to object to the certain uses of your data

## If you have any further questions or complaints:

Please contact us on jazzy@wardenfarms.co.uk in the first instance.