

## Welcome to the Furley Cottages privacy notice

Furley Cottages 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 whenever that information is provided to us. This includes when you, or someone on your behalf, request information from us, contact us (or we contact you), make a booking, use our website(s)/apps, link to or from our website(s)/apps, connect with us via social media, through office or any other engagement we have with you (regardless of where you are based). It also tells you about your privacy rights and how the law protects you. This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Furley Cottages collects and processes your personal data in our dealings with you, including in providing accommodation and other services to you, including any data you may provide through our website.

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**

This privacy notice is issued on behalf of the Furley Cottages so when we mention "we", "us" or "our" in this privacy notice, we are referring to the relevant company, being Furley Cottages responsible for processing your data. Furley Cottages is the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### **Contact details**

Our full details are:

Full name of legal entity: Furley Cottages

Name or title of data privacy manager: Kerstin Langdon

Email address: [Info@furleycottages.com](mailto:Info@furleycottages.com)

Postal address: Goodmans House Membury, Axminster. Devon EX13 7TU

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 17<sup>th</sup> February 2019 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.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **The data we collect about you**

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). 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, username or similar identifier, , title, date of birth and gender.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Special Requirements Data** includes disability and or dietary requirements.
- **Financial Data** includes payment card details.
- **Transaction Data** includes details about payments from you and other details of your bookings, stays and other services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website/or any apps.
- **Profile Data** includes your username and password, services provided to you, your, , feedback and survey responses.
- **Marketing and Communications Data** includes your preferences as to whether you are happy to receive marketing from us and, if so, your communication preferences.

### **How is your personal data collected**

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

**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, via this website/apps, on social media or otherwise. This includes personal data you provide when you:

- make a booking at one of our cottages, whether for overnight stays, functions;
- check in to one of our cottages;
- create an account on our website;
- subscribe to our newsletter and/or other publications;
- request a brochure or other promotional or marketing materials to be sent to you;
- enter a competition, or respond to a promotion or survey; or
- give us some feedback.

**Automated technologies or interactions.** As you interact with our website/apps or via social media, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

**Third parties acting on your or your employer's behalf.** We may receive personal data about you if a booking is made for you by another person, who may be a family member or travelling companion, or a travel agent or other intermediary, working for you or, where you are travelling on business, your employer or other third party on your behalf.

**Other third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources. For example:

- Technical Data from analytics providers such as Google based outside the EU;
- Analytics providers such as DoubleClick and Google based outside the EU;

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

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- In the case of any accident or a medical or other emergency, to protect your or another individual's vital interests, where you or they are not able to give consent.
  
- sending direct marketing communications to you;
- information about your health, any disabilities and dietary requirements that you volunteer to us to enable us to accommodate your needs during your stay.

You have the right to withdraw consent at any time by [Contacting us](#).

### **Purpose for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make a booking including reserving disability adapted accommodation	(a) Identity (b) Contact	To enter into a contract with you or perform our contract with you  Your explicit consent (disability requirements)
To provide accommodation and other services to you including meeting your specific health, disability and dietary requirements, and to collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)  Your explicit consent (for processing health, disability and dietary requirements)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey, or participate in a prize draw or competition	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business including our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a

		<p>business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and promotional information to you and measure or understand the effectiveness of our marketing</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p>	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about our services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To deal with an accident or medical or other emergency</p>	<p>(a) Identity (b) Special Requirements/ Special Categories of Personal Data</p>	<p>To protect your or another individual's vital interests</p>

<p>To deal with issues, complaints or disputes arising out of our relationship with you, and to prevent or detect crime, including fraud</p>	<p>(a) Identity (b) Financial (c) Technical (d) Profile (e) Special Requirements</p>	<p>To establish, exercise or defend legal claims</p>
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When we refer to legitimate interests we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We do not undertake automated decision making using your personal data.

**Marketing/promotional offers**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

We will not share your personal data with any company outside Furley Cottages for marketing purposes without your express consent.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [Contacting us](#) at any time.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information read about the cookies we use.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **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 who have a business need to know. Processors we appoint will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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 enable us to deal with your request or to speed up our response.

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 we have received a number of requests. In this case, we will notify you and keep you updated.

## **Data retention**

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

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.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after the transaction in question. We also need to keep information for that period to be able to deal with any dispute.

In some circumstances you can ask us to delete your data: see [Request erasure](#) 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.

## **Monitoring**

We may monitor and/or record:

web, social media and app traffic and activities

## Cookies policy

This cookies policy describes the way in which furleycottages.com operated by Furley Cottages stores or accesses information on the device that you use in order to access the Site.

By using the Site, you are providing your consent to Furley Cottages storing and using cookies in accordance with this cookies policy. However, you can adjust the settings on the browser you use to view the Site to remove or limit the types of cookies that it accepts. More information about this is set out in the section "Managing Cookies" below.

**What are Cookies?** Cookies are small text files that are placed on your computer, mobile or another device that you are using to access that website, so that the website can remember and identify it. They contain anonymous information and will typically include the name of the domain from which the cookie has come; the "lifetime" of the cookie; and a value, usually a randomly generated unique number.

They are widely used in order to make websites work, or work more efficiently, as well as to provide aggregate information to the owners of the site about their usage. For example, they enable a website to identify that when you move from one page to another you are not treated as a new user and so do not need to log on again. We also use cookies to help make your use of the Site clear and easy, to help improve the content of the Site and to personalise your visit.

Some websites will also use cookies to enable them to target their advertising or marketing based for example, on your location or browsing habits.

Cookies can be set by the owner of the website itself ("first party cookies") or by other websites that provide content (such as advertising) for the website that you are viewing ("third party cookies").

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### How the Site uses Cookies

We may send a cookie which may be stored by your browser on your computer's hard drive. We may also use that information to recognise your computer when you visit our Site, and to personalise our Site for you.

Some cookies used on the Site are temporary and remain on your device until you leave the Site, at which point they are deleted. These are often called session cookies. Session cookies are typically used on the Site to allow you to carry information across pages of the Site and avoid having to re-enter information, and to allow you to access stored information whilst you are logged into a user account on the Site.

Other cookies used on the Site remain on your device once you have left the Site (though how long will depend on the lifetime of the specific cookie). These are often called persistent cookies. Persistent cookies are typically used on the Site to help it recognise your device when you return to it, and to help us improve the structure of the Site by compiling anonymous, aggregated statistics that allow us to understand how users use the Site.

The cookies used by the Site can be grouped into categories.

#### Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

#### Categories

##### Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

#### Categories

##### Functional Cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages.

If you do not allow these cookies then some or all of these services may not function properly.

#### Categories

##### Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

#### **Managing Cookies**

##### **Disabling and Enabling Cookies**

Most browsers allow you to refuse to accept cookies. Your browser may have a Help section or some other form of instructions which should explain how to do this. If you are using a smartphone, then the manufacturer should have instructions on its website explaining how to do this. Useful guidelines on how to do this for a number of popular computer browsers can be found on the [ICO website](#).

Please note that if you do disable any cookies, this will have a negative impact upon the usability of many websites, including this one.