## **Privacy Policy**

#### About this policy

This policy describes how we use your personal data when you use our websites (<a href="www.creakeabbey.co.uk">www.creakeabbey.co.uk</a> and <a href="www.creakeabbey.co.uk">www.creakeabbey.co.uk</a> and <a href="www.creakeabbey.co.uk">www.creakeabbey.cafe.com</a>) or sign up to receive our email newsletters using the sign-up card from the Creake Abbey Café & Food Hall or by filling in a slip at an event. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

You can read, print and save this whole policy.

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#### Who we are and how you can contact us

We are Creake Abbey Partners, landlord to tenants at Creake Abbey, and Creake Abbey Limited a Limited Company with registration number 10065844 which operates the Café & Food Hall. The registered office address for Creake Abbey Ltd is Ingram House, Meridian Way, Norwich NR7 0TA.

You can contact us in writing at the address above or by emailing <a href="mailto:diana@brocklebankscott.net">diana@brocklebankscott.net</a> If you would like to speak to us please call us on 07801 418 907

Please refer to the sections on <u>Your rights to know what personal data we hold and to control how we use it and How to make a complaint for further contact information.</u>

### What personal data we collect about you

We collect:

- personal data that you provide to us. There are lots of ways in which you may share your personal data with us, for example, you may register on our website, post on social media sites that we run, or contact us in connection with goods or services that you would like to buy, or have already bought, from us. The personal data that you provide to us may include your name, address, e-mail address and phone number, plus in some cases financial and credit card information.
- personal data that we receive from third parties. If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may have your name and contact details passed to us by a supplier that refers you to us so that we can provide you with goods or services or receive feedback from a sub-contractor we have instructed to help us provide you with goods or services that you have requested such as a courier company.
- **personal data about your use of our website.** This is technical information and includes details such as your IP address, your login information, browser type and version, as well as details of how you navigated to our website.
- What we use your personal data for

We use your personal data in the following ways:

- personal data that you provide to us is used to:
  - provide you with the information, products and services that you request from us
  - provide you with marketing information in accordance with your marketing preferences (see <u>How we use your personal data for</u> marketing)
  - manage and administer our business

- review and improve our goods and services
- **personal data that we receive from third parties** is combined with the personal data that you provide to us and is used for the purposes described above.
- personal data about your use of our website is used to:
  - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
  - improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device
  - as part of our efforts to keep our site safe and secure
  - measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
  - make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them

#### Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our <u>Cookie policy</u>

#### When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights

Please refer to the section on <u>How we use your personal data for marketing</u> to read about marketing consents.

#### Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "Subject Access Request" and send it to us at Creake Abbey, North Creake, Fakenham, NR21 9LF or by email to diana@brocklebankscott.net by post or email or using the details in the Who we are and how you can contact us section. We may ask you to pay a £10 fee before we respond to your request.

### You also have rights to:

- prevent your personal data being used for marketing purposes (see <u>How we use</u> your personal data for marketing for further details)
- have inaccurate personal data corrected, blocked or erased
- object to decisions being made about you by automated means or to your personal data being used for profiling purposes
- object to our using your personal data in ways that are likely to cause you damage or distress
- require that we delete your personal data
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file

You can find full details of your personal data rights on the Information Commissioner's Office website at ww.ico.org.uk.

## When we will share your personal data with others

We share your data with the following people in the day to day running of our business:

- other companies that are part of the Creake Abbey family
- limited sub-contractors we work with to provide you with goods or services that you have requested from us
- analytics and search engine providers that assist us in the improvement and optimisation of our site

We may also share your personal information with third parties on a one-off basis, for example, if:

we sell or buy any business or assets (including our own), in which case we will
disclose your personal data to the prospective seller or buyer of such business or
assets

#### How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers or with Campaign Monitor or similar e-marketing platform
- In the future encrypting any payment transactions made through our website using SSL technology or described alternative payment method
- ensuring that relevant staff receive regular data security awareness training
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems

Please remember that you are responsible for keeping your passwords secure. If, in the future, we give you (or you choose) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. Please do not share your password with anyone.

Unfortunately, sending 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 personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

## How we use your personal data for marketing

We will add your details to our marketing database:

- If you have filled in a card at the Café & Food Hall which asks for feedback and enables you to leave your email address so you can be subscribed to our marketing database to receive marketing communications
- If you have filled in a free prize draw slip or similar at an event which invites you to leave your email address so you can be contacted if you win and subscribes you to our marketing database to receive marketing communications

- If you have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services
- If you have registered on our website and have indicated during the sign up process that you are happy to receive marketing communications

We may send you marketing communications by email.

We never share your personal data with third parties for marketing purposes

## How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep:

- your name, address (if supplied) and email address so long as you remain as a subscriber.
- a record of the goods and services we provide to you for 5 years
- complaint records for 1 year

Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

### How you can make a complaint

If you are unhappy with the way we have used your personal data please contact us to discuss this using the contact details set out above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting <a href="www.ico.org.uk">www.ico.org.uk</a>. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

## How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website (www.creakeabbey.co.uk) or you can contact us (see Who we are and how to contact us) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown in the footer of the policy and the date on which that version of the policy came into force.

This is policy version 2 which is compliant with the new GDPR coming into effect on 25<sup>th</sup> May 2018.