# YLIM / Loch Monzievaird Chalet Privacy Statement

#### **LAST UPDATED MAY 2018**

### 1. Your Privacy

YLIM operates the Loch Monzievaird Chalets site for the purposes of renting out part or all of the site to customers for self-catering chalet rental, functions, conferences, corporate bookings and youth camps.

To further these purposes, YLIM/Loch Monzievaird Chalets may collect, process, use, and share your personal information. The purpose of this Privacy Statement is to explain to you how YLIM might use your personal information and how YLIM takes seriously its obligation to you to protect your rights and your personal information.

Where we use the terms "YLIM," "we," "us," and "our," we refer to YLIM Limited, a company limited by guarantee and registered in England and Wales (company number: 09229784).

"Personal information" generally refers to all data that directly or indirectly relates to you, but "personal information," "personal data," or "personally identifiable information" and other terms may apply based upon applicable law and will carry the meaning of those applicable laws.

From time to time, we may update this Privacy Statement, so we encourage you to review this statement periodically, paying special attention to the "LAST UPDATED" date above. In certain circumstances, YLIM may contact you to specifically notify you of changes to this Privacy Statement.

### 2. YLIM / Loch Monzievaird Chalets's Commitment to Data Protection

It is the global policy of YLIM/Loch Monzievaird Chalets to exercise a high standard of care in its handling of the personal information it collects, processes, uses, and shares. YLIM/Loch Monzievaird Chalets will maintain appropriate policies and processes to enhance the protection of personal data and ensure compliance with applicable laws and regulations. YLIM/Loch Monzievaird Chalets is also committed to the periodic review and augmentation of these policies and processes.

# 3. Laws That Apply to This Privacy Statement

For the avoidance of doubt, the system of law governing this Privacy Statement is the law of England and Wales.

## 4. How We Use Your Personal Information

YLIM/Loch Monzievaird Chalets uses the personal information you provide to better serve your requests and fulfill our obligations. We do not sell, lease or rent your personal information to others. We do not use anyone's personal data for profiling or computer automated decision making. YLIM/Loch Monzievaird Chalets will only process your personal information in accordance with an appropriate legal basis and only for the purposes described in this Privacy Statement. The table below provides a list of examples of how we may use your information, the types of information involved, and the legal basis for our use of your information.

| How do you<br>interact with<br>YLIM/Loch<br>Monzievaird<br>Chalets?   | What personal data<br>do we collect?  | Why do we collect it?  | What's the legal basis?                 | Who is access restricted to within YLIM?                          |
|---|---|--|---|---|
| I have made an enquiry or a booking for a self-catering chalet rental, a function, a conference, a corporate booking or a youth camp. | Name, contact information, date of birth, any further information you choose to give us (e.g. disability, dietary or medical information) | In order to provide you with the services or the experience you requested.   | Contract & legitimate interests         | Management,<br>bookings and<br>facilities staff as<br>appropriate |
| I have previously visited the site  | Name, contact information   | To send you information about further opportunities to use the site from time to time, including special offers and discounts. To ask for feedback about how we can improve our service. | Consent                                 | Management<br>staff handling<br>our<br>communications             |
|   | Photo & video   | To promote our services  | Consent                                 | Management & photographers  |
| I am a YLIM<br>employee or a staff<br>applicant   | Name, contact details, date of birth, bank details, national insurance number, pensions details, criminal convictions data, next of kin.  | In order to follow our recruitment and vetting procedures; to enter into a contract of employment  | Contract                                | Management  |
| I have made a complaint   | Name, contact details, details of complaint   | In order to resolve your complaint   | Legitimate interests & legal obligation | Management  |
| I am a current /<br>former site visitor<br>or a current /<br>former employee  | [All data categories listed above]  | To fulfil our legal reporting obligations (for example, a financial / tax audit).  | Legal<br>obligation                     | [Personnel as listed above]                                       |

#### 5. How Information is Collected

We obtain personal information about you in the following ways:

# Directly from you:

- 1. <u>Through websites owned by YLIM/Loch Monzievaird Chalets.</u> Any information you choose to enter is inputted into our system as appropriate so that we can respond to your enquiry or booking request.
- 2. <u>Through direct interaction.</u> Any information you supply to us in person or via a form (e.g. a staff recruitment form).
- 3. <u>Cookies and Other Automated Technologies:</u> If you have visited and/or registered on a YLIM/Loch Monzievaird Chalets website, some of your personal information may have been gathered by cookies or other automated technologies. Read the section below on YLIM's use of cookies for additional information.

#### From third parties:

- 4. <u>From third-party service providers.</u> If you make a booking through a third-party site, the third-party will provide us with the information necessary for us to service your booking request, subject to applicable third-party data processing agreements.
- 5. <u>From third-party corporate or charitable entities booking our site.</u> If you are attending an event at Loch Monzievaird, the organisation making the booking may disclose certain personal details about their delegates in order to enable us to better look after you during your stay. This is subject to applicable third-party data transfer agreements.

### 6. How and When We Might Share Your Information

YLIM/Loch Monzievaird Chalets does not generally disclose personal information with anyone outside the organisation. However, YLIM/Loch Monzievaird Chalets may, for the purposes described above, share your personal information with:

- 1. <u>Third-party service providers</u> whom YLIM/Loch Monzievaird Chalets has contracted to assist in the types of uses described above, (such as our external accountants) subject to applicable third-party data processing agreements in which your rights are protected.
- 2. <u>Statutory or regulatory organisations</u> for obligatory purposes described above.

### 7. Data Retention

We take care to only hold your Personal Data as long as we need it for. Our retention frameworks are periodically reviewed and take account of our processing needs, our legal responsibilities and your data rights.

### 8. International Data Transfers

YLIM/Loch Monzievaird Chalets holds your personal data in the UK. Service providers processing data on our behalf may do so on servers located outside of the UK, but this is subject to compliant international safeguards being in place and are covered within applicable third-party data processing agreements.

# 9. Your Rights

If you are located in the European Economic Area or the United Kingdom, you have certain rights related to your personal information. If you wish to exercise any of those rights, please email YLIM/Loch Monzievaird Chalets at <a href="lochmonzievaird@gmail.com">lochmonzievaird@gmail.com</a> We will respond to your request within 30 days. We may need to verify your identity in order to process your request.

These European rights include:

#### 1. Right of access

You have the right to know that we are processing your personal information, how we are processing this information, and for what purposes. This Privacy Statement is intended to provide the transparency necessary for you to know this information, but you can certainly make additional inquiries to YLIM/Loch Monzievaird Chalets by emailing lochmonzievaird@gmail.com

#### 2. Right to Edit and Update Information

You have the right to rectify inaccurate information, update your personal information, and supplement incomplete information held by us. You can contact YLIM/Loch Monzievaird Chalets by emailing lochmonzievaird@gmail.com, and we will address your request without undue delay.

# 3. Right to Delete Personal Information

You have the right to request us to delete your personal information for the following reasons:

- a) If the data is no longer necessary for the purposes it was collected.
- b) If you withdraw previously given consent where consent is required to process the information.
- c) If you object to YLIM processing the data in a certain way or for certain purposes and YLIM does not have legitimate grounds to continue processing the information.
- d) If your personal information has been unlawfully processed.
- e) If your personal information must be erased to comply with a legal obligation.
- f) If the personal information has been collected in relation to the offer of Information Society Services as defined in Article 8(1) of the General Data Protection Regulation.

We may be required to reject your request to delete your information for the following reasons:

- a) For exercising the right of freedom of expression and information.
- b) For compliance with a legal obligation.
- c) For reasons of public interest as described in Article 17 of GDPR.
- d) For the establishment, exercise or defense of legal claims.

To make a request to delete information, you can email YLIM at lochmonzievaird@gmail.com. We will notify you within 30 days as to whether your request has been accepted or if and for what reason we cannot fulfill your request.

#### 4. Right to Request the Limitation of Processing Personal Information

You have the right to restrict our processing of your personal information for the following reasons:

- a) If you believe your personal information is inaccurate, you can request that we limit our processing of the data until its accuracy is verified.
- b) If the processing of your data is unlawful, you may either request erasure as described above or request certain restrictions.
- c) If the controller does not need the information for the purposes above but must retain the information for the establishment, exercise or defense of legal claims.
- d) If you have objected to the processing of your personal information and there is a pending determination as to whether our legitimate grounds to process override your rights described here. As with any request for erasure of your personal information, you also have the right to be notified by us about a restriction in the processing of your personal information.

You can make this request by emailing YLIM/Loch Monzievaird Chalets at lochmonzievaird@gmail.com

### 5. Right to Portability

You have the right to request us to send you your personal information in a structured, commonly used, machine-readable format so that it can easily be transferred and used by a third-party if:

- a) You provided us with the information.
- b) The processing of your personal information is based on your consent or required for the performance of a contract; or
- c) The processing is carried out by automated means. You can make this request by emailing YLIM at lochmonzievaird@gmail.com.

### 6. Right to Object and Automated Individual Decision-making

You have the right to object to our processing of your data when our legal basis for processing is

YLIM's legitimate interests based on your particular situation. Upon receiving an objection from you, YLIM will cease to process your information unless we can demonstrate compelling legitimate grounds for the processing which overrides your rights and freedoms.

Particularly, you have the right to object to the processing of your personal information related to direct electronic marketing.

You also have the right to object to our processing of your information where decisions on processing are made by automated processing which has a legal or other significant impact on you.

You can make this request by emailing YLIM/Loch Monzievaird Chalets at lochmonzievaird@gmail.com.

- 7. Right to Withdraw Consent
  - YLIM/Loch Monzievaird Chalets is primarily processing your information based on our legitimate interests and other obligations. However, where you have given consent to us to process your personal information, you have the right to withdraw that consent and we will promptly respond. You can make this request by emailing YLIM/Loch Monzievaird Chalets at lochmonzievaird@gmail.com.
- 8. Right to File a Complaint with the Data Protection Authority
  We want to provide the best service to you related to these requests and resolve any issue you have with YLIM related to the processing of your personal information. You, however, always have the right to contact your local data protection authority for assistance or to make a complaint.

  While the rights explained above do not apply to those outside of the European Economic Area and the UK, as a matter of rights and freedoms, we still do care about your questions and concerns related to your personal information. If you are not located in the European Economic Area or the United Kingdom, you can contact YLIM/Loch Monzievaird Chalets at <a href="located-iochannet-located-iochan

### 10. Security

To safeguard and secure the information we collect, YLIM/Loch Monzievaird Chalets has applied appropriate physical, electronic and managerial procedures to prevent unauthorised access and maintain data accuracy. Sometimes password protection is used to protect your privacy and security. YLIM/Loch Monzievaird Chalets will continue to augment current security procedures and adopt new security protocols as necessary to meet the standard of care we have promised in our policies and in this Privacy Statement.

YLIM/Loch Monzievaird Chalets is also committed to a prompt response to any potential data breach and will issue timely notices as required by applicable law.

### 11. Information Collected by Cookies or Technology

Cookies are small parcels of data stored temporarily on your hard drive while you are browsing a website. These are a standard mechanism used by most websites. By continuing to use this website with cookies enabled, you consent to our use of cookies. Our website uses cookies to keep track of individual users as they progress through the on-line booking process. This is necessary in order to distinguish between users to keep your booking separate from other bookings.

Our website also employs cookies for the purpose of generating access statistics. These provide us with

general information about how our website is used. However, no personal information that would enable us to identify individuals is either obtained or stored in these cookies and they are deleted automatically within 24 hours.

Cookies are often used to track a user's browsing history for the purpose of targeted advertising. Our website does not set any cookies of this type.

We use a third-party service provided by Google Analytics to provide us with further general information about the performance of this website. The data collected by Google is aggregated to show general trends and does not identify individual users. From time to time, we may also use other third-party services such as Facebook, Twitter and other social media, the presence of which will be readily apparent from their onscreen icons. In each case, any cookies set by the providers of these services are set by them directly. They are not set by this website and we have no control over them. Please refer to these services' own privacy policies if you wish to check how they use cookies.

Should you wish to disable cookies, please refer to your browser's Help function. Please note, however, that disabling cookies will affect your ability to use this website, as the on-line booking system will not operate without them. Many websites will not run correctly with cookies disabled, especially ones that require you to log in or that offer any form of checkout or booking process, as cookies are usually needed to keep track of individual transactions.