

# HIGHLAND SPACES WEBSITE AND PRIVACY POLICY

## **Introduction**

Welcome to HIGHLAND SPACES privacy policy.

HighlandSpaces respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you when you interact with us and it explains your privacy rights and how the law protects you.

The safety of your personal data (as set out below) is important to us.

## **Important information and who we are Purpose of this privacy policy**

This privacy policy aims to give you information on how HighlandSpaces collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or make a booking with us.

This website is not intended for children and we do not knowingly collect data relating to children (unless in connection with a booking made with us).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

## **Controller**

This privacy policy is issued on behalf of all parts of the business associated with HighlandSpaces so when we mention “HighlandSpaces”, "we", "us" or "our" in this privacy policy, we are referring to the relevant part of the HighlandSpaces business responsible for processing your data. We will let you know the identity of the entity that will be the controller for your data when you make a booking or otherwise purchase a product or service with us.

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

## **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Contact name: Niki Kinloch Bakshy

Email address: [bookings@highlandspaces.com](mailto:bookings@highlandspaces.com)

Telephone number: 07717748708

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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

We keep our privacy policy under regular review. This version was last updated in May 2022.

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**

HighlandSpaces 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 policy 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 as follows:

- **Identity Data** includes: first name, maiden name, last name, username or similar identifier, driver registration number (if applicable), title, date of birth and gender.
- **Contact Data** includes billing address, delivery address (if applicable), email address and telephone numbers.
- **Financial Data** includes bank account (if applicable) and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased or ordered 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.
- **Profile Data** includes your customer history with us, orders made by you, your interests, preferences, feedback and survey

responses.

- **Usage Data** includes information about how you use our website, and how you make use of our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and (if appropriate) our third parties and your communication preferences.

We may also from time to time collect, use and share

**Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data with others to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

**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.

## **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 personal and contact details and/or financial details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes, without limitation, personal data you provide in the following circumstances:

- making a booking with us
- purchasing a voucher with us;
- applying for our products or services;
- completing an online enquiry form;
- subscribing to our newsletter or to one of our other services or publications;
- requesting marketing to be sent to you;
- making an inquiry
- entering a competition, promotion or survey; or providing us with feedback or contacting us

### **Automated technologies or interactions.**

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

### **Cookies**

Cookies are small digital signature files that are stored by your web browser that allow your preferences to be recorded when

visiting the website. Also they may be used to track your return visits to the website. 3rd party advertising companies may also use cookies for tracking purposes.

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.

[Read more about cookies on this website](#)

### **Third parties or publicly available sources.**

We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties: analytics providers based outside the EU, including Google Analytics; and search information providers.

**Contact, Financial and Transaction Data** from providers of technical, payment and delivery services

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

We will only use your personal data when we are permitted to do so under relevant applicable law. Most commonly, we will use your personal data in the following circumstances:

To enhance the visitor's experience when using the website to display personalised content and possibly advertising.

E-mail addresses will not be sold, rented or leased to 3rd parties.

E-mail may be sent to inform you of news of our services or offers by us or our affiliates.

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 obligation. We always aim to get your consent before sending third party direct marketing communications to you via email however we will not send you marketing communications by text message. You have the right to withdraw your consent to receive any form of marketing from us at any time by contacting us by email at:

[booking@highlandspaces.com](mailto:booking@highlandspaces.com)



## Purposes 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate</b>
To register you as a new guest or customer with us, or as supplier with	(a) Identity	Performance of a contract with you

<p>To manage and process your booking with us including:</p> <p>(a) Manage payments, fees and charges;</p> <p>(b) Collect (and (if necessary) recover) money owed to us.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d)</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our</p>

<p>To enable you to complete a survey or enter into a competition</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c)</p>	<p>(a) 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 business</p>

<p>To deliver relevant website content and marketing communications to you and measure or understand the effectiveness of our communications with you.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and</p>	<p>(a) Technical (b)</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant,</p>

<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e)</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
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## **Marketing**

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

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage 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

products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you have been, or will be, a guest with us or if you have otherwise been, or will be, a customer of HighlandSpaces or you have received or requested services from us and you have not opted out of receiving that marketing.

### **Third-party marketing**

We will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you by contacting us at any time through our website or by email: [bookings@highlandspaces.com](mailto:bookings@highlandspaces.com)

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us in other ways such as a result of a previous, potential or anticipated service experiences with us or other relevant transactions to our business.

## **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 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 be required from time to time to process your personal data without your knowledge or consent due to relevant applicable law.

## **Disclosures of your personal data**

### **International transfers**

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

### **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 only our employees, agents, contractors and other third parties who have a business reason to know. They 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.

## **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, subject always to applicable legal requirements.

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 as this is no longer personal information.

## **Your legal rights**



You have the right to:

**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.

**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.

**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), or where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable 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.

**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.

**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:

- If you want us to establish the data's accuracy. Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**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.

**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.

If you would like further information on how you can exercise these rights, please email us at [bookings@highlandspaces.com](mailto:bookings@highlandspaces.com)

### **No fee usually required**

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 or, at discretion, we may alternatively refuse to comply with your request in these circumstances.

### **What we may need from you**

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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could 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 (by your preferred means of communication) and keep you updated.

