

# PRIVACY POLICY

## 1. INTRODUCTION

- 1.1 At Butlin's we are committed to protecting and respecting your privacy, whilst striving to provide the very best guest experience. We work very hard to keep your information safe and we want our services to be safe and enjoyable for everyone. We follow strict security procedures on how personal information is stored and used and who sees it to help stop any unauthorised person getting hold of it.
- 1.2 This privacy policy (and any other documents referred to in it) sets out the basis on which we will process and use any personal information about our website visitors and guests that we collect from them, that they provide to us, or that we collect from third parties. Please read this privacy policy carefully to understand our practices regarding your personal information and how we will treat it.
- 1.3 This privacy policy was last updated on 25 May 2018.

## 2. IDENTITY AND CONTACT DETAILS

- 2.1 We have a legal duty to protect personal information that we collect under Privacy Legislation such as, the Data Protection Act 2018 (the "DPA") and the Privacy and Electronic Communications Regulations 2003 (PECR).
- 2.2 For the purpose of the DPA and PECR, we are the data controller and are located at **One Park Lane, Hemel Hempstead, HP2 4YL**. If you have any queries relating to this policy you may also contact us at [privacy@butlins.com](mailto:privacy@butlins.com).

## 3. PERSONAL INFORMATION WE COLLECT FROM YOU AND HOW WE USE IT

- 3.1 We may collect and use various types of personal information about visitors to our websites and guests who book a holiday with us. Details of this information are set out below:
  - a. When you make an enquiry, confirm a booking or buy a holiday home we will collect your name, contact information and details about the places you are interested in so that we can provide you with the information that is of interest to you. This information we collect can include the following:
    - Name
    - Date of birth
    - Telephone contact details
    - Email address
    - Postal address
  - b. We may collect and use certain other personal information when we correspond with you (whether by telephone, email, social media, web chat or otherwise). This will normally be limited to:
    - Name
    - Email address
    - Booking number
    - Postcode
    - Other information you provide during the course of the correspondence
  - c. Where there are additional members of your party, we will ask you for their name and date of birth. These are used to allow us to manage your booking.
  - d. If you take part in a competition we will collect and process information about your entry.
  - e. We collect information about your credit or debit card where you use it to pay for our services.We use this information for the following purposes:
  - a. Providing the products, services and information that you ask us for and performing our obligations to manage your holiday booking or holiday home ownership services – all to ensure you have a great time with us.
  - b. Responding to messages from and corresponding with you regarding your booking or holiday home ownership and recording any communications.
  - c. To administer your Butlin's website account(s).
  - d. Allowing you to participate in interactive features of our website and other services.
  - e. Administering competitions that you may enter.The legal basis for our use of this information is to fulfil our contract(s) with you.

- f. We may also use this information for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- g. To protect our guests and premises from crime, we operate CCTV and Automated Number Plate Recognition (ANPR) systems in our resorts and car parks which record images for security.
- h. If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this data for the purposes of preventing or detecting unlawful acts. Our aim is to protect our guests and business from criminal activities.

The legal basis for our use of this information is our legitimate interest to protect our guests and business and to develop and improve our services.

- 3.2 We will collect and use certain technical information about you and your visit when you visit our website. This may include:
  - The IP address of the device you use
  - The pages you visit on our website, whether the page load was successful, and the order in which you visit them
  - The browser which you are using

We collect this for the following purposes:

- a. Improving our website and ensuring that content is presented effectively.
- b. Managing our website and ensuring that it is safe and secure. This is outlined in more detail in the cookie policy ([link here](#)).
- c. Administering our website and other systems and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis for our use of this information is our legitimate interest in developing and improving our services.

- 3.3 We may collect details of your marketing preferences and whether or not you want to receive certain marketing messages (e.g. marketing emails) from us.
- 3.4 Our website will place third party cookies, web beacons (such as the Facebook pixel) and other storage technologies on your device which are used to provide personalised advertising to you.

We combine this with your personal information detailed in 3.1 and 3.2 and we use this information for the following purposes:

- a. Providing you with marketing information about our services that we feel may interest you if you have agreed to receive these (these can be unsubscribed from at any time using links provided in the emails).
- b. Providing you with personalised advertising across participating websites you visit. You can opt out of this by opting out of marketing emails or by managing your cookies as detailed below.
- c. Providing information about changes to our services.

Where you have booked or received a quotation for a holiday with us, received a quotation for a holiday home purchase with us or own a holiday home with us, the legal basis for our use of this information is our legitimate interests in promoting and selling our services. You have the right to object to us processing this data at any time and our right to process data is not overridden by your interests, fundamental rights and freedoms.

If you have not booked or received a quotation for a holiday or holiday home purchase with us, the legal basis for our use of this information is your consent. You have the right to withdraw your consent at anytime.

Where our website places third party cookies, web beacons and other storage technologies on your device, the legal basis for their use of this information is your consent which is given when you accept the use of cookies. You can manage all cookies using your browser settings or using a service such as <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>. You can manage your preferences for the Facebook pixel through Facebook settings. See our Cookie Policy (Section 9) for more information.

- d. We may collect certain other information that you give us, for example, if you take part in discussion boards or other social media functions on our website, participate in a webchat, register with us for and/or enter into promotions, complete surveys, or report problems with our website.

- e. If you are involved in a reportable accident or incident while you are with us, we will record your details and the incident details in our accident book.

The legal basis for our use of this information is our legitimate interests in managing our business and developing our services.

- 3.5 We combine the information you provide with certain information we obtain from other sources. This can include:

- Electoral roll
- Credit reference agencies
- Demographic information

We process this information to:

- a. improve our ability to present you with offers which may be of interest to you.

Where you have booked or received a quotation for a holiday with us, received a quotation for a holiday home purchase with us or own a holiday home with us. The legal basis for our use of this information is our legitimate interests in promoting and selling our services. You have the right to object to us processing this data at any time and our right to process data is not overridden by your interests, fundamental rights and freedoms.

If you have not booked or received a quotation for a holiday with us, the legal basis for our use of this information is your consent. You have the right to withdraw your consent at any time.

- b. Validate your identity so that we can accept your booking or purchase.
- c. Protect our business and you from fraud and other illegal activities.

The legal basis for our use of this information is our legitimate interests in managing our business and promoting our services.

#### **4. HOW WE USE SENSITIVE PERSONAL INFORMATION**

- 4.1 We do not normally collect sensitive personal information from you. However, if you make us aware of any special requests for your booking, including anything due to specific medical, dietary or religious requirements, we will note these so that we can do our best to meet your request. We will not process this data for any other purpose.

The legal basis for our use of this data is your consent and to fulfil our contract with you. You have the right to object to us processing this data at any time and our right to process data is not overridden by your interests, fundamental rights and freedoms.

#### **5. HOW WE SHARE PERSONAL INFORMATION**

- 5.1 We do not share website visitor and guest personal information with third parties for the purposes of the third party sending marketing information.
- 5.2 We share our website visitor and guest personal information, as necessary, with the following third parties:
- a. Any member of our group, which includes our subsidiaries.
- b. Selected third parties, such as business partners and service providers where we ask them to fulfil services which enhance your holiday experience, maintain your holiday home or provide other services such as fulfilment of marketing activities. In these cases, the third parties act as data processors for us and your information remains in our care and under our control.
- c. Prospective buyers of our business or assets.
- d. Third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our guests, staff and assets or when obliged to by court order or similar legal obligation.
- e. Third parties, such as law firms and law courts, to enforce or apply any contract with you.

#### **6. WHERE WE TRANSFER AND STORE PERSONAL INFORMATION**

- 6.1 The personal information that we collect from our website visitors and guests will be transferred to, and stored at, destinations outside the European Economic Area, (the EEA). To safeguard your personal information and to make sure that it is properly protected we have put in place contractual safeguards with our data processors.

#### **7. RETENTION OF PERSONAL INFORMATION**

- 7.1 We will keep your personal information for limited and appropriate periods of time only.
- 7.2 We will retain your personal information for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or allowed by law. If you need further information, please contact us at [privacy@butlins.com](mailto:privacy@butlins.com)

#### **8. YOUR RIGHTS IN YOUR PERSONAL INFORMATION**

- 8.1 You have certain rights in respect of the personal information that we hold about you. Details of these rights are set out below. To exercise any of these rights, please contact us at [privacy@butlins.com](mailto:privacy@butlins.com)
- 8.2 We will process all personal data in line with your rights, in each case to the extent required by and in accordance with applicable law only (including in accordance with any applicable time limits and any requirements regarding fees and charges). We will respect your personal information rights in respect of:
- a. Access
- We will confirm to you whether or not we are processing and using personal information about you, at your request, and if so, provide you with access to, and a copy of such personal information and the other details to which you are entitled.
- b. Rectification
- We will correct any inaccurate personal data and complete any incomplete personal data (including by providing a supplementary statement) that we hold about you.
- c. Prevention of processing likely to cause damage or distress
- We will respect your rights under the DPA to require us to cease or not to begin processing your personal information for a specific purpose, or in a specific way, that is likely to cause you or any third parties unwarranted damage or distress.
- d. Erasure
- We will erase your personal information at your request without undue delay.
- e. Restriction
- We will restrict the processing of your personal information in certain circumstances, if you ask us to do so.
- f. Data portability
- We will provide you or third parties on your behalf with a copy of any personal information that we hold about you which you have provided to us in a structured, commonly used and machine-readable format.
- g. Objection (including objection to direct marketing)
- We will respect your general rights to object to the processing of your personal information in certain circumstances, including for direct marketing purposes. We will usually inform you (before collecting your information) if we intend to use your information for such purposes, or if we intend to disclose your information to any third party for such purposes.
- h. Automated decisions and profiling
- We will not make decisions based on automated processing, including profiling.

- f. Data portability

We will provide you or third parties on your behalf with a copy of any personal information that we hold about you which you have provided to us in a structured, commonly used and machine-readable format.

- g. Objection (including objection to direct marketing)

We will respect your general rights to object to the processing of your personal information in certain circumstances, including for direct marketing purposes. We will usually inform you (before collecting your information) if we intend to use your information for such purposes, or if we intend to disclose your information to any third party for such purposes.

- h. Automated decisions and profiling

We will not make decisions based on automated processing, including profiling.

#### **9. COOKIE POLICY**

- 9.1 What are cookies?
- Cookies are small text files that are stored by the browser you use on your computer or mobile device when you visit a website. All websites use cookies, primarily to:
- Allow a website to work more efficiently
  - Make the site easier to navigate by remembering information you've entered
  - Customise the site by showing you information that's relevant to you
- Cookies set by the website owner are called 'first-party cookies'. Cookies that have been set by parties other than the website owner are called 'third-party cookies'.
- 9.2 Why do we use them?
- We use cookies to improve your website experience and to tailor it to your needs.
- Examples of how we use cookies include:
- To gather information which allows us to identify your platform and record sales
  - To ensure you are provided with correct and useful information during your visit to our site
  - To allow you to proceed through our checkout
  - To collect data which allows us to improve our services based on purchases and site usage
  - For statistical analysis purposes
- 9.3 What you need to know about the types of cookies that we use
- a. Necessary – these help make a website usable by enabling basic functions like page navigation and access to secure areas of the web site. The website cannot function properly without these cookies and therefore 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 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.

b. Preferences – these cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in. 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.

c. Statistics – these cookies allow us to count visits and traffic sources and improve 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. Statistical/performance cookies do not collect personal data.

d. Marketing – 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 switch these cookies off at browser level you will experience less targeted advertising.

Our lawful basis for collecting your personal information by using cookies is our 'legitimate interest' to develop and market our services. We believe that users of our websites have reasonable expectations that cookies will be collected and that you can opt out using browser settings.

#### 9.4 Third-party cookies

Some of the cookies on our website are not related to Butlin's and are placed by our advertising partners and other third parties. For example, if you visit a web page that contains embedded content, such as a YouTube video, the other website may send cookies to you. These third-party cookies may collect your personal data and so we have provided you with a link to find further information and to allow you to manage all cookies at a browser level:

<http://optout.networkadvertising.org/?c=1#!/>. Please note that we cannot be responsible for an external website's content.

#### 9.5 Third-party cookie providers

There are a small number of common third-party cookie providers for whom we provide more information:

##### a. Facebook

If you browse a page within our website which includes a Facebook product (e.g. a Like button), and you have a Facebook account, Facebook will use cookies to enable them to offer you relevant information and products. It also helps them understand the information they receive from you.

Our website also uses a **Facebook Pixel**, which is a web beacon, to personalise advertising to you. You are able to manage your Facebook related marketing through the settings on your Facebook account.

##### b. Google Analytics

Our website uses Google Analytics Premium, a web analytics service provided by Google Ireland Limited ('Google'). Google Analytics Premium is a data processor for Bourne Leisure and their terms of service can be found here:

<https://www.google.com/analytics/terms/us.html>

Google Analytics uses cookies to help the website analyse how users use the site and does not store any personal information. The information generated by the cookies about your use of the website will be transmitted by your browser to Google on servers in the United States and other countries.

#### 9.6 Google Marketing Platform

The website uses pixels, or transparent GIF files, to help manage online advertising. These GIF files are provided by our ad management partner, Google Marketing Platform. These files enable Google to recognize a unique cookie on your Web browser, which in turn enables us to learn which advertisements bring users to our website. The cookie was placed by us, or by another advertiser who works with Google. With both cookies and pixels, the information that we collect and share is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or email address. For more information about Google Ads, including information about how to opt out of these technologies, go to:

<https://www.google.com/intl/en/policies/privacy/>

#### 9.7 How you can control cookies

You have the right to decide whether to accept or reject cookies. If you do not want to accept cookies you can change your browser settings. However, if you do this, please be aware that you may lose some functionality of the website. Each browser is different so please check the Help menu of your own browser to find out more about how to change your cookie preferences.

You can control individual cookies on your browser at the [Network Advertising Initiative's website](#) or at [Your Ad Choices website](#).

For more information about cookies and how to disable them, please visit the [Information Commissioner's webpage](#) about cookies. You can also read more about cookies at [www.aboutcookies.org](http://www.aboutcookies.org). Please note that we cannot be responsible for external websites' content.

### 10. HOW WE LOOK AFTER YOUR INFORMATION

10.1 We treat your information with the utmost care and take all appropriate steps to protect it.

10.2 We secure access to all transactional areas of our websites and apps using 'https' technology.

10.3 Access to your personal information is password-protected, and sensitive data is secured and tokenised to ensure it is protected.

10.4 We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

### 11. CHANGES TO OUR PRIVACY POLICY

11.1 We reserve the right to modify this privacy policy from time to time. Any changes we make in the future will be posted on the following website: [www.butlins.com](http://www.butlins.com). You should check back frequently to see any updates or changes to our privacy policy.

### 12. CONTACT AND COMPLAINTS

12.1 Questions, concerns, comments, requests or complaints regarding this privacy policy, our website and/or our use of your personal information should be addressed to [privacy@butlins.com](mailto:privacy@butlins.com)

12.2 If you have any complaints regarding this privacy policy, you may also contact the UK Information Commissioner at telephone number **0303 123 1113** or <https://ico.org.uk/>