1. **Introduction**

Welcome to The Polgooth Inn’s privacy policy.

The Polgooth Inn 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 and tell you about your privacy rights and how the law protects you.

The Polgooth Inn is the data controller and responsible for your personal data in this notice.

If you have any questions about this privacy policy please contact us at: The Polgooth Inn, Ricketts Lane, Polgooth, St. Austell, Cornwall, PL26 7DA. Or enquiries@polgoothinn.co.uk

We keep our privacy policy under regular review. This version was updated on the date shown at the foot of the policy.

1. **Purpose of this privacy policy**

This privacy policy aims to give you information on how The Polgooth Inn collects and processes your personal data through your use of the The Polgooth Inn website, when you visit us, when you sign up for email alerts or offers and when you use our WIFI.

It is important that you read this privacy policy together with any other notification we give you about processing your personal data on specific occasions when we are collecting or processing your personal data so that you know how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

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

1. **THE DATA WE COLLECT ABOUT YOU**

Personal data means any information about you from which you can be identified. It does not include data where the identity has been removed (anonymous data).

We collect, use, store and transfer different kinds of personal data about you including your name, any reservation details you provide us with, date of birth, gender, telephone number, email address and whether or not you want to receive email or text marketing to us when you visit us, interact with us through our website and when you sign into our WIFI.

[Like most websites, ours collects some personal data about you automatically when use it including [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.]

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.

1. **If you fail to provide personal data**

If you fail to provide personal data where we need it to provide products or services to you, or where it is required by law we may not be able to provide products and services to you when requested to do so.

1. **HOW IS YOUR PERSONAL DATA COLLECTED?**

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

* **Direct interactions.** When you:
* fill in forms or create an account on our website
* log into our WIFI
* subscribe to our newsletters
* when you visit us
* request marketing to be sent to you
* enter a competition, promotion or survey
* give us feedback or contact us
* **Automated technologies or interactions.** As you interact with our website, we will automatically collect information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details. If you visit us we may capture your image on CCTV.
* **Third parties or publicly available sources.** We will receive personal data about you from various third parties:
	+ 1. analytics providers such as Google based outside the UK
		2. external providers of WIFI, which you give your personal information to when accessing WIFI when you visit us
		3. providers of social media platforms, including where you use social media to sign onto WIFI when you visit us and if you share our content on social media
		4. service providers who operate a service for us that requires details from you

We may combine personal data from different sources for the purposes set out in this privacy notice.

1. **our legal basis for processing 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 do so to perform a contract 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
* Where you consent to us doing so
1. **Purposes for which we will use your personal data**

We use the personal data of customers the following purposes:

* to perform contractual obligations to you, including processing your reservation or order with us and receiving payments
* to comply with our own legal obligations (for example health and safety laws)
* to manage our relationship with you – such as by sending you messages about changes to our terms and conditions, privacy notice, to provide you with information about products or services or to ask you to leave a review or complete a survey
* to deal with your enquiries and provide you with information you have requested
* to provide you with information about bookings or services
* to administer and protect our business (including identifying usage trends, determining the effectiveness of promotional campaigns and advertising and keeping our website and premises secure)
* to contact you with marketing information about our products and services
1. **Promotional offers and marketing**

We may use your personal data to decide which of our products or services we think may be of interest to you.

We may send you marketing communications by email or text if you have opted in to receive such information or where you have purchased goods or services from us and you have not opted out of receiving that marketing.

You can opt out of marketing communications at any time by following the instructions in the marketing message or by contacting us.

1. **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 about the cookies we use, please see our cookie policy.

1. **who do we disclose your personal data to?**

We may disclose your personal data as follows:

* Third parties who provide services to us which involves processing personal data (including providers of IT related services)
* Law enforcement agencies, courts or other relevant parties as necessary for the establishment or defence of legal rights and/ or prosecution or prevention of criminal activity;
* Professional advisors and authorities such as HMRC
* Third parties which are considering buying some or all of our assets or shares
* Third parties operating plugins or content on our website which you interact with (such as social media providers)

Third-party service providers are not permitted to use your personal data for their own purposes and may only process your personal data in accordance with our instructions.

1. **INTERNATIONAL TRANSFERS**

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

* We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
* Specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on transfers of personal data out of the UK.

1. **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.

1. **DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

1. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

You have the right to:

**Request access** to your personal data. 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.

**Request erasure** of your personal data where we have no good reason to continue processing it.

**Object to processing** of your personal data where we are relying on a legitimate interest) and you want to object to processing because you feel impacts on your fundamental 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 certain circumstances.

**Request the transfer** of your personal data to you or to a third party. 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 (such as when we **email** or **text** you with marketing offers).

Not all rights are absolute, you can find out more about your rights relating to your personal data here: <https://ico.org.uk/for-the-public/>.

You will not have to pay a fee to exercise your rights as a data subject although we may charge you a reasonable fee (or refuse to comply) if your request is clearly unfounded, repetitive or excessive.

We may need you to provide identification information before we action your request to exercise your right as a data subject, this is to protect your information and to make sure we do not disclose your information to someone who is not entitled to receive it. We may also ask you to provide further details about what you want before we can respond to your request (this can help us speed up our response).

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.

1. **Third-party links**

This 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.

Last updated: February 2024

**Drafting notes for template privacy notice:**

1. This is a template. It is the duty of data controllers to review their practices with personal data and ensure their privacy notice complies with the law.
2. You should read this document carefully and make sure it is accurate.
3. You should take independent legal advice.
4. Section 1 – data controller – the name and address details of the data controller company should be clearly identified.
5. [Square brackets] and yellow highlight together indicate there is information to fill in.
6. [Square brackets] mean you should make sure the information is correct for your business and delete where necessary.
7. All square brackets should be deleted before use.
8. Section 3 – this should reflect what your website actually does by way of automatic data collection, this is an example only.
9. Section 11 – international transfers – if you are definitely not transferring personal data outside the UK you can say so here. However, data processors (such as google, Microsoft, AWS) may be storing data for you on servers outside the UK. Individuals are entitled to know how their data is protected when it is transferred to countries with less robust laws on data protection than the UK/ EEA.

NOTE: THIS IS A TEMPLATE PRIVACY NOTICE TO ASSIST COMPLIANCE WITH THE LAW. IT IS NOT LEGAL ADVICE AND HAS NOT BEEN WRITTEN TO TAKE ACCOUNT OF YOUR BUSINESS SPECIFICALLY. YOU SHOULD READ THE WHOLE DOCUMENT CAREFULLY AND ENSURE THAT IT IS FACTUALLY CORRECT WHEN IT REFERS TO YOUR BUSINESS. YOU SHOULD TAKE INDEPENDENT LEGAL ADVICE ON THE CONTENTS OF THIS DOCUMENT.