



# atlantic reach

at home in Cornwall

## Atlantic Reach Privacy Policy

### What Data do we Collect and where do we get it from?

For the purposes set out in this notice, the Information Commissioner (ICO) requires us to advise you that, information, including personal information detailed below relating to you or anyone else that is a customer, will be collected and processed by Atlantic Reach Ltd and/or on its behalf by its third party service providers. This data will be provided by you, or any other person you may appoint to provide us with information. You will either be completing application forms or answering questions we ask you, in order to provide the required information. We may also obtain information from other sources that is readily available in the public domain such as the Internet, Social Media etc.

### Personal Data

This is information we may gather from you that will directly or indirectly identify you as an individual, and may also provide information about your cultural or social identity. This data will include but may not be limited to:

Your title, name, postal address, gender, date of birth, contact details, bank details, credit / debit card details, credit searches, Next of Kin information, children's data where the child is under 16, vehicle information.

### Special Categories of Data

This is information we may gather from you that might reveal your racial or ethnic origin or your health. This data will include but may not be limited to:-

Your title, gender, race, ethnic origin, physical or medical health conditions, children's data where the child is under 16.

We will have asked for, and recorded either your verbal or documented consent to process any special categories of data that we may have collected from you.

Each time you visit our website, we may automatically collect Technical information including IP address. The controller of this Personal Data is Atlantic Reach Ltd ("we" and "us") of Atlantic Reach, Whitecross, Newquay, Cornwall, TR8 4LX. If you have any query, please contact [info@atlanticreach.co.uk](mailto:info@atlanticreach.co.uk). We process your Personal Data in accordance with this Privacy Notice, which is also available on our website.

### 1. How and why do we Process Your Personal Data?

The following paragraphs detail:

- why we collect your data and the consequences of not providing it
- our legal basis as required by the Regulations
- who we share your data with and why
- how long we will retain your data
- Legal basis for processing

## **Why we collect your data**

We obtain, collect and process your Personal Data and Special Categories of Data (which includes sharing your data with others) to enable us to manage the safety and security of Atlantic Reach. If you do not provide the data requested it may not be possible to provide one or more products or services required. Provide various products and services offered by Atlantic Reach Ltd as part of our trading activities. These products and services include:

- Provision of management services to Leaseholders.
- Supply of self-catering holidays, accommodation and camping holidays.
- Provide leisure club memberships including use of the gym, fitness classes, swimming pools etc.
- Other recreational activities on offer at Atlantic Reach.

## **What do we process your data for:**

Any of the information we collect from you may be used in one of the following ways:

To improve customer service. Your information helps us to more effectively respond to your customer service requests and support needs, and to manage the site known as Atlantic Reach.

To process transactions, your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

To send periodic communications, the email address and contact information you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving occasional company news, updates, related product or service information, etc. If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

## **Who we share your data with and the reason for processing**

We are a Data Controller and in order to process your requests we may be sharing your data with one or more other Data Controllers. The Controllers we may share with and our reasons for sharing that information are listed but not limited to the following:

- Insurers
- Regulatory obligations
- Police Legal obligations
- Possible Suppliers
- Insurers replacement facilities - ie, cleaning companies, plumbers, builders, electricians and the like.
- Staff
- Debt Agency - To collect unpaid moneys due
- It Providers - Software, Hardware, Cloud & Systems Management
- Where we need to provide information about you
- Solicitor
- Claims against clients or claims against us
- Other Data Controllers not detailed above
- To be shared only for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise.

## **How long we retain your data**

We will retain your Personal Data for the time necessary to provide the service requested or stated by the purposes outlined in this document.

We have stated the reasons we are collecting your data above, but in the event that you do not wish to provide us with your Personal Data for all or any of the above reasons, this may limit our ability to provide a service to you.

If at any point in the future we need to amend this policy, our website will always have the latest version uploaded.

## **2. Where do we hold your Data?**

At all times we will endeavour to hold your Data on servers within the UK, or within the European Economic Area (EEA). Where we share your information with other Data Controllers they must also agree to hold your Data within the EEA. However, in the unlikely event your data is to be held in any other geographical area we ensure that:

Data Controllers do not do so without our prior written authority and

An appropriate transfer agreement is put in place to protect your personal data

## **3. Your Acknowledgment of this Notice and Your Rights**

Under General Data Protection Regulation you have rights and these are listed below.

### **Right to Be Informed**

The General Data Protection Regulation sets out the information we must provide to you about your Data. All of the information we are required to give you is contained within this Privacy Notice. If you do not understand any part of this, you should contact us immediately and we will be happy to explain it to you.

### **Right of Access**

You have the right to access and obtain a copy of the Personal Data, and any supplementary information that we hold about you to enable you to verify the lawfulness of the processing carried out. This will be provided free of charge, unless your request is unfounded, excessive or repetitive, and the information will be sent to you within 30 days of your request being received. If we refuse your request, you have the right to complain to the ICO.

### **Right to Rectification**

You have the right to request that we correct any inaccuracies in the Personal Data we hold about you. This will be corrected within one month. If we are unable to correct the inaccuracy you have the right to complain to the ICO.

### **Right to Erasure**

You have the right to request that we erase your Personal Data. For example, you may exercise this right in the following circumstances:

- your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;
- you withdraw consent and no other legal ground permits the processing;
- you object to the processing and there are no overriding legitimate interests for the processing;
- your Personal Data was unlawfully processed; or
- your Personal Data must be erased for compliance with a legal obligation.

We refuse the right to delete your information when it falls within our data retention period stated above, as this data may be required to exercise or defend litigation in the event of a claim whether covered or not by an insurance policy. If you do not agree with this you have the right to complain to the ICO.

### **Right to Restrict Processing**

You have the right to restrict our processing of your Personal Data where any of the following circumstances apply, although we will still be allowed to store it:

- where you feel that the Personal Data which we hold about you are not accurate. Processing will be restricted until you verify the accuracy of the information
- where the processing is unlawful and you do not want your Personal Data be erased and request the restriction of its use instead;
- where we no longer need to process your Personal Data but the data may be required to establish, exercise or defend a legal claim
- where you have objected to our processing of your Personal Data pending the verification of whether or not our legitimate business interests override your interests, rights and freedoms.

Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it in accordance with the requirements of this policy or our legal obligations.

### **Right to Object to Processing**

In certain circumstances, you have a right to object to our processing of your Personal Data

- Where we have processed it as a legitimate interest (including profiling)
- Direct Marketing (including profiling)
- Processing for scientific / historical research and statistics

We will still be able to process your Personal Data where

- We can demonstrate compelling legitimate grounds for us to process your Personal Data which override your interests, rights and freedoms
- The processing is for establishment, exercise and defence of legal claims.

### **Right to Withdraw Consent**

Where the legal basis of Consent has been used for Childrens' data or special categories of data, you have the right to withdraw that consent at any time. Where you exercise your right to withdraw consent of the processing of any children's data or special categories of data, any data processed prior to the withdrawal of consent will remain valid.

If you would like to exercise any of your rights detailed above, please contact [info@atlanticreach.co.uk](mailto:info@atlanticreach.co.uk)  
You may raise any concerns about Atlantic Reach Ltd processing of your Personal Data with the Information Commissioner Office.

## **4. Changes to this Notice**

We may amend this notice on occasion, in whole or part, at our sole discretion. Any changes to this notice will be effective immediately upon uploading to our website. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post and you will have a choice as to whether or not we use your information in the new manner. If you have questions or concerns about this notice, please contact [info@atlanticreach.co.uk](mailto:info@atlanticreach.co.uk).

## **5. Information about or provided by another person**

Where your information for your policy has been provided to us by another person, we will send you a copy of this privacy notice directly to you, where we have your address, within one month of your policy being taken out. If we do not have / are unable to hold your address for any reason, we will send a copy of this to the person arranging the insurance with instructions to pass this to you within one month.

Where you have taken out a policy and provided us with information about another person, eg: an additional driver to your motor policy, an additional person to your travel insurance particularly where health conditions have been disclosed, it is unlikely we will have their address, and therefore you must provide them with a copy of this Privacy Notice so that they will know how their data is being used.

Additional copies can be supplied on request.