

BALNAGOWN

PRIVACY NOTICE FOR WEBSITE

INTRODUCTION

This is the Privacy Notice of Balnagown Castle Properties Limited (company registration no. 01048050), whose registered office is at 55 Park Lane, London W1K 1NA, (referred to as “Balnagown Estate”, “the Estate”, “we”, “us” or “our” in this Privacy Notice).

In terms of data protection law (EU General Data Protection Regulation 2016 and the Data Protection Act 2018, as amended or superseded from time to time) (“Data Protection Law”), we act as a Data Controller because we determine the personal data to be collected by us and the means by which, and purposes for which, we process that data. Personal data means any data that relates to a living individual who can be identified directly or indirectly from that data. It does not include data where the individual’s identity has been removed completely (anonymised data).

As a data controller under Data Protection Law, we are committed to protecting and respecting your privacy. We will process your personal data in accordance with Data Protection law and this Privacy Notice.

PURPOSE OF THIS PRIVACY NOTICE

The information contained in this Privacy Notice describes what personal data we collect and what we will do with your personal data, including personal data that:

- we collect from our website or from social media interactions
- you provide to us for the purpose of entering in a contract with us or under a contract that you have entered into with us
- you provide to us when you visit our premises
- you otherwise provide to us in interactions with us

This Notice also outlines your privacy rights and provides details of how we aim to protect personal data we will collect or we may collect relating to you. You should read this Privacy Notice, together with any other notice we provide on specific occasions when we are collecting or processing your personal data, so that you are fully aware of how and why we are using your personal data.

THE PERSONAL DATA WE COLLECT

We process personal data to meet our legal, statutory and contractual obligations and for our legitimate interests. We may process the following personal data relating to you:

- **Identity Data** - such as title, name, user ID
- **Contact Data** - such as your address, billing address, email address, telephone numbers
- **Financial Data** - such as bank and payment card details
- **Transactional Data** - such as payments provided from and to you and details of services provided to you
- **Technical data** - such as your IP address, login information, browser type and version, time zone setting and location, browser plug-ins and other technology on the devices used to access our website
- **Profile data** - including your purchases or orders made by you, your interests and preferences, health information (special category data) and any feedback or survey responses provided to us
- **Usage data** - including how you use our website, products and services
- **Marketing and communications data** - including your preferences in relation to marketing from us and from any third parties and your preference for method of communication.
- **Social media information** - username, company details, engagement details (likes, retweets, shares, reactions, comments)
- **Special Categories data** - sometimes we need to process sensitive personal information (*known as special category data*) about you, to ensure your safety and good health. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.
- **CCTV Images** - used by us for the prevention, detection and investigation of criminal activity and to keep our guests, visitors and staff safe. Images are only stored for a maximum of one month. As a data controller, it is our policy not to disclose images to anyone other than the police or other law enforcement authorities.

CHILDREN

We do not knowingly collect personal data from children. If you believe your child has provided personal data to us, please contact us at: Estates Office, Balnagown, Kildary, Ross-shire IV18 so that we can delete your child’s information.

PERSONAL DATA OF THIRD PARTIES

If you act on behalf of, or make reservations for, another person, we will also collect their data, for the purposes outlined in this Notice.

FAILURE TO PROVIDE PERSONAL DATA

In some cases we may need to collect your personal data by law, or in order to perform our side of a contract we have entered into with you or with a view to entering into such a contract, or in our legitimate interests. If you fail to provide the requested data, we may not be able to perform under the contract we have with you, or to enter into the contract with you or way may be prevented from achieving our legitimate interests (such as engaging with you). In such circumstances, we may have to cancel the contract, or be unable to conclude the contract, which means we would not be able to provide the product or service to you. If that is the case, we will notify you of that at the time.

COLLECTION OF PERSONAL INFORMATION VIA COOKIES

A cookie is information sent by a web server to a web browser, which enables the server to collect information from the browser. Find more about cookies at www.allaboutcookies.org. We may collect some personal data about your uses of our website when you visit the website. The placement of cookies throughout our websites allows us to enhance the user journey. This data is held for use in Google Analytics to better understand customer behaviour and to better deliver our products or services. We use these cookies to identify you when you visit our websites and to build up a profile about you. Most browsers allow you to turn off cookies, in which case your experience may not be optimal when visiting our website.

HOW WE COLLECT PERSONAL DATA

We may collect your personal data in a number of ways, for example, when you visit our website, make a reservation, contact us, purchase products from us or visit our premises.

Direct interactions – you may provide personal data to us (e.g. identity, contact details, financial data) when you complete forms or correspond with us by post, phone, email or other methods. This could include providing personal data when you:

- make an enquiry to receive our services or products
- request marketing material to be sent to you
- enter a promotion or complete a survey
- provide feedback to us

We may also obtain some personal data from a third party booking system, Supercontrol, whose privacy policy can be read [here](#).

Automated technologies or interactions – When you interact with our website, we may collect some technical data relating to you including details about your devices or browsing patterns, for example. This data may be collected using cookies (see above) or other similar technologies.

Third parties or publicly available sources – We may receive personal data relating to you from third parties or public sources, inside or outside the European Economic Area (“EEA”) including:

- analytics providers (e.g. Google based outside the EEA)
- advertising networks (e.g. Google, Facebook)

We may also obtain your personal data from social media platforms when you engage with our social media accounts, including Facebook, Google+, Twitter and LinkedIn.

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 intend to use your personal data, and the legal basis we will rely upon to do so. We have also identified what our legitimate interests are, where appropriate. Please note that we may process your personal data for more than one lawful purpose, depending on the specific purpose for which we are using your data.

Purpose / Activity	Type of Personal Data	Lawful Purpose for Processing	Retention Period
To process your enquiry, set up a new customer account/profile	Identity Contact Profile	<ul style="list-style-type: none">- Consent (if required)- Enter into or performance of contract to which you are party.- Legitimate Interest	For the period in which we deal with your enquiry or for as long as you

			remain a customer.
To process your booking / reservation, whether made directly with us on our website or via a 3 rd party.	Identity Contact Financial Transactional Profile Marketing & Communications Special Categories	<ul style="list-style-type: none"> - Performance of contract to which you are party - Necessary for our legitimate interests to ensure you safety whilst on our premises - Consent (if required) - Vital Interests 	7 years.
We may process Credit Card or other payment data for invoicing purposes.	Financial Transactional	<ul style="list-style-type: none"> - Performance of contract, to which you are party 	For duration of transaction only.
To confirm your identity where we are legally permitted or obliged to do so, e.g. nationality and passport number.	Identity Contact	<ul style="list-style-type: none"> - Performance of a contract to which you are a party - Legal Obligation - Legitimate Interest 	Maximum 3 years from last stay date
To comply with data retention obligations and to enable us to contact you and welcome you back in the future	Identity Contact Profile Transactional Marketing & Communications	<ul style="list-style-type: none"> - Legal obligation - Legitimate Interest - Performance of contract to which you are party. 	For any statutory retention period, for a period that is necessary for our legitimate interests or for maximum 3 years from last stay date
Where applicable, if you park in our car park we will collect your car registration number	Profile	<ul style="list-style-type: none"> - Legitimate Interest 	Maximum 3 years from last stay date
To seek to ensure we keep the data we store secure on our premises and on our IT systems and platforms. We do this by means of encryption, passwords, access controls, physical security, company policies and IT support. Personal data may be processed in this context by us and our 3 rd party vendors	Identity Contact Profile Transactional	<ul style="list-style-type: none"> - Legitimate Interest - Legal Obligation 	Maximum 3 years from last stay date
We may collect (meta)data on your use of our Wifi services for security and anti-piracy purposes. for example IP address, connections made, location etc.	Technical	<ul style="list-style-type: none"> - Consent (if required) - Legitimate Interest - Public interest 	Maximum 3 years from last stay date
We may track and record your use of our online services, either through cookies or via other means. Cookies enable us and others to monitor your browsing behaviour.	Technical Usage	<ul style="list-style-type: none"> - Legitimate Interest 	Maximum 3 years from last stay date
We hold your social media information in the course of operating our social media accounts such as Twitter, Facebook, LinkedIn, Google+, to pursue our legitimate interest in maintaining a visible, engaging and relevant social media presence.		<ul style="list-style-type: none"> - Legitimate Interest 	For the period during which we are connected on any given social media platform.
We may collect automatically generated information for statistical (research) purposes, to tell us how well our services are working. This information may be provided to third parties, but only if permitted by law or if this information cannot be traced back to you.	Usage	<ul style="list-style-type: none"> - Legitimate Interest 	Maximum 3 years from last stay date

We may collect personal data to safeguard your health whilst staying in our accommodation and using our facilities.	Special Categories Profile	<ul style="list-style-type: none"> - Consent (if required) - Legitimate Interest - Vital interest 	Maximum 3 years from last stay date
We aim to keep our assets, staff, guests and other visitors secure and safe at all times and to prevent our premises being used for illegal purposes. Though CCTV surveillance we may process personal data by way of image.	CCTV Images	<ul style="list-style-type: none"> - Legitimate Interest - Vital interest - Substantial Public Interest 	One month
We will provide personal data where legally required to do so to comply with legal obligations requests from public authorities, for third party claims to access our data, or in response to requests for information from public authorities in the event of a fire or other emergency incidents.	Identity Contact Technical	<ul style="list-style-type: none"> - Legitimate Interest - Public Interest - Vital Interest - Legal Obligation 	Maximum 3 years from last stay date.
We may carry out advertising and marketing activities to promote our services, both on and offline, and also through third party providers. Where permitted to do so by law, we may use your contact details, information on your hotel stay and information collected through cookies on our website.	Identity Contact Profile Marketing & Communications	<ul style="list-style-type: none"> - Consent (if required) - Legitimate Interest 	Maximum 3 years from last stay date
We may offer same or similar services and products you have previously requested or purchased from us, if we think you are interested, including via email, if you have consented to us doing so. You can withdraw that consent at any time, if you no longer wish to receive marketing or promotional information, by contacting us at info@balnagown.com to unsubscribe.	Identity Contact Profile Marketing & Communications	<ul style="list-style-type: none"> - Consent (if required) - Legitimate interests 	For duration of consent, or on basis of legitimate interests, or maximum 3 years from last stay date.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage, Profile and Marketing and Communications 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 us to market to you. You will receive marketing communications from us if you have requested these communications specifically by opting in, or if you have purchased similar goods or services from us in the last 2 years. In any case, you will have the option to unsubscribe or opt out by contacting info@balnagown.com, or if the communication is by email, a link within the email.

THIRD-PARTY MARKETING

We will not share your personal data with any third party for marketing purposes, unless we obtain your express opt-in consent before we share.

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 or by contacting us at any time at info@balnagown.com.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

The personal data you provide to us may be accessed by or given to third parties, some of whom may be located outside the EEA who act for us for the purposes set out in this Privacy Notice or for other purposes approved by you. Those parties process information, fulfil and deliver orders, process credit card payments and provide support services on our behalf.

We may also pass aggregated information on the usage of our website to third parties, but this will not include information that can be used to identify you, either directly or indirectly.

If our business enters into a joint venture with or is merged with or sold to another business entity, your information may be disclosed to our new business partners or owners. Countries outside the EEA do not always have strong data protection laws. We will take steps to ensure that any data that is provided to such third parties is shared in accordance with Data Protection Law and the data is used by third parties in accordance with Data Protection Law and this Privacy Notice. Unless required or permitted by law to do so, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

INFORMATION RETENTION

We will retain your personal data for as long as we need it for the purposes for which we collected it, or if we are legally required to do so. The retention period for different types of personal data/purpose is shown in the table above. Further information is available about our retention periods, from: Estates Office, Balnagown, Kildary, Ross-shire IV18 ONU.

DATA SECURITY

We take all appropriate technical and organisational measures, in accordance with Data Protection Law, to protect your personal data against accidental or unlawful destruction or loss, alteration, unauthorised disclosure or unauthorised access. To this end, we have implemented technical and operational measures such as login/efficient password and physical protection.

YOUR RIGHTS AS AN INDIVIDUAL

As an individual, you have the following rights as a data subject under Data Protection Law in relation to the processing of your personal data:

- To be informed about what of your personal data is being processed, and how it is being processed.
- To request access to your personal data (a data subject access request), which enables you to receive a copy of the personal data we hold about you and the check that we are lawfully processing it.
- To request correction of any incomplete or inaccurate information being processed.
- To request erasure of your personal data, so that we delete or remove personal data where there is no good and lawful reason for us to continue to process it.
- To object to processing of your personal data where we are processing your personal data for direct marketing or where we are relying on a legitimate interest (of our own or of a third party) and there is something specific to your situation which gives rise to your objection.
- To request the restriction of processing of your personal data, through the suspension of our processing, e.g. where you want us to establish its accuracy or the reasons for the processing.
- To request the transfer of your personal data to another party in an easily portable and readily accessible form.
- To withdraw consent at any time where we are relying on consent to process your personal data (although this will not affect the lawfulness of any processing carried out before the withdrawal of consent).
- Where processing is under a contract or by consent, to request that a decision made using automated processing of your personal data, which significantly affects you, be reviewed by an individual to whom you may make representations and contest the decision.

We do not usually charge individuals for any requests made regarding the collection of information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. We will need you to identify yourself properly prior to responding to your request. To this end we may request a valid identification such as a current driver's licence, identity card or passport.

CHANGES TO OUR PRIVACY NOTICE

The Privacy Notice was last updated on 24/05/2018, In order to assist us in keeping the personal data we process about you accurate and up to date for the duration of your relationship with us, it is important that you inform us of any change to your personal data that you have provided to us, as soon as possible, by contacting us at info@balnagown.com. We keep our Privacy Notice under regular review and we will place any updates to this Notice on our website.

QUERIES OR INDIVIDUAL REQUESTS

If you wish to place a query about any aspect of how we use your personal data, submit a Data Subject Access Request or exercise your other rights as an individual under Data Protection Law, please contact us at info@balnagown.com or write to us at Estates Office, Balnagown, Kildary, Ross-shire IV18.

CONCERNS OR COMPLAINTS

We only process your personal data in compliance with this Privacy Notice and in accordance with Data Protection Law. If, however you have a concern, or wish to make a complaint, about the processing of your personal data by us, you have the right to lodge a complaint with the UK Information Commissioner at any time. The website of the UK ICO's office contains details of how to make a complaint: <https://ico.org.uk/>.