



## **Privacy Policy Notice**

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### **The policy**

This privacy policy notice is served by Reads Court Ltd, 1A Reads Avenue, Blackpool, FY1 4BW, trading as The Blackpool Resort Family, under the website [www.blackpoolresort.co.uk](http://www.blackpoolresort.co.uk). The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and/or refrain from submitting your personal data to us.

### **Policy key definitions:**

- "I", "our", "us", or "we" refer to the business, Reads Court Ltd, trading as The Blackpool Resort Family.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

### **Key principles of GDPR:**

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

### **Processing of your personal data**

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

In accordance with General Data Protection Regulation (GDPR), we and Freetobook observes reasonable procedures to prevent unauthorised access and misuse of personal information. We use appropriate business systems and procedures to protect and safeguard any personal information given to us. We also use security procedures and technical and physical restrictions for accessing and using the personal information on our servers. Only authorised personnel are permitted to access personal information in the course of their work.

- We are registered with the ICO under the Data Protection Register, our registration number is: ZA628764.
  - **Lawful basis:** Contract  
**Where our purpose for processing is:** Bookings and Reservations  
**Which is necessary because:** The storage of your information may be necessary to perform the contract that you have with the accommodation provider you are booking with.  
**We process your information in the following ways:** When booking to stay with us, we collect and store information that you give. You are asked for your name, address, telephone number and email along with payment information. This information is stored in our booking system in order to process your booking. You may be contacted by us in relation to your booking. Your data is also stored after you have stayed but will be kept no longer than necessary in order to comply with legal obligations and for us to welcome your repeat business. We use booking software at this accommodation to facilitate online booking, along with the provider (Freetobook.com) and together operate as joint data controllers for the processing of your personal data.  
**Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.  
**Sharing your information:** We do share your personal information with third parties and they include: Freetobook (our booking engine); JotForm (a platform which provides our registration forms and post-booking data collection forms) – the Data Processing Addendum can be found here: <https://drive.google.com/file/d/1SEp7WwdTMIFtXhX2mIxQaBCawmCwSmcL/view?usp=sharing>  
If you provide payment information, this will be stored by secure PCI Level 1 compliant system, for no longer than required in relation to your booking.
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- **Lawful basis:** Legitimate interests  
**Where our purpose for processing is:** We may use your information for our legitimate interests, such as for administrative, fraud detection and legal purposes.  
**Which is necessary because:** We take online payments and need to detect fraud and provide secure payment links.  
**We process your information in the following ways:** Our booking engine, Freetobook, will detect any fraudulent information through an automated process.  
We correspond with you via email for administrative purposes.  
**Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.  
**Sharing your information:** We do share your personal information with third parties and they include: Freetobook.com (our booking engine).  
If you provide payment information, this will be stored by secure PCI Level 1 compliant system, for no longer than required in relation to your booking.  
Our email mailboxes are provided by land1 internet, who securely store data from emails on their servers in Germany.
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- **Lawful basis:** Legitimate interests  
**Where our purpose for processing is:** Marketing and Research  
**Which is necessary because:** Business Development.  
**We process your information in the following ways:** Website usage data with Google Analytics.  
Reviews - you may also be asked to send feedback after your stay in order for the property to further improve our service. Your email address will be used for this purpose. If you complete a review it may be posted on the property website, Facebook page, Twitter, Instagram or Google Plus. However, no identifying details will ever be attached to a review posting.

**Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.

**Sharing your information:** We do share your personal information with third parties and they include; Google Analytics and Remarketing; Google Tag Manager; Facebook Tracking Pixel.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

## **Your individual rights**

Under the GDPR your rights are as follows. You can read more about [your rights in detail here](#).

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [[www.ico.org.uk](http://www.ico.org.uk)] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

You have the right to access data that is stored on behalf of us taking bookings via the freetobook system. You need to email or write to us to request an overview of your personal data. You can also contact us if you believe that the personal information we have for you is incorrect, if you believe that we are no longer entitled to use your personal data or if you have any other questions about how your personal information is used or about the Privacy Policy Notice. You can email our Data Controller Scott Baker on [hello@blackpoolresort.co.uk](mailto:hello@blackpoolresort.co.uk) or write to us at Reads Court Limited, 1A Reads Avenue, Blackpool FY1 4BW.

## **Internet Cookies**

We use Cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.

Some Cookies are required to enjoy and use the full functionality of this website.

We use a Cookie Control system which allows you to accept the use of Cookies, and control which Cookies are saved to your device / computer. Some Cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

### **Type of Cookies We Use:**

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser.

We use both session and persistent Cookies for the purposes set out below:

### **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts.

### **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

### **Functionality Cookies**

Type: Persistent Cookies

Administered by: Third party – theasys.io

Purpose: These cookies allow us to display the 360° images of apartments on our website, and they also allow you to interact with these images.

### **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third party – Google

Purpose: These Cookies are used to track information about traffic to the website and how users use the website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the website. We may also use these Cookies to test new advertisements, pages, features or new functionality of the website to see how our users react to them.

### **Targeting and Advertising Cookies**

Type: Persistent Cookies

Administered by: Third party – Google

Purpose: These Cookies track your browsing habits to enable us to show advertising which is more likely to be of interest to you. These Cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third party advertisers can place Cookies to enable them to show adverts which we think will be relevant to your interests while you are on third party websites.

### **Social Media Cookies**

Type: Persistent Cookies

Administered by: Third party – Google; Third party - Facebook

Purpose: In addition to our own Cookies, we may also use various third parties Cookies to report usage statistics of the website, deliver advertisements on and through the website, and so on. These Cookies may be used when you share information using a social media networking website such as Facebook, Instagram, Twitter or Google+.

### **Your Choices Regarding Cookies**

If you prefer to avoid the use of Cookies on the website, first you must disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this website. You may use this option for preventing the use of Cookies at any time.

If you do not accept our Cookies, you may experience some inconvenience in your use of the website and some features may not function properly.

If you would like to delete Cookies or instruct your web browser to delete or refuse Cookies, please visit the help pages of your web browser.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

- For the Safari web browser, please visit this page from Apple: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

### **More Information about Cookies**

You can learn more about Cookies at the following third-party websites:

- Network Advertising Initiative: <http://www.networkadvertising.org/>

## **Data security and protection**

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

## **Fair & Transparent Privacy Explained**

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

## **Email marketing messages & subscription**

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as: times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences.

Our EMS provider is Mailchimp. We hold the following information about you within our EMS system;

- Email address
- I.P address
- Subscription time & date
- First Name
- Preferred language
- Preferred Email Client

## **Resources & further information**

- [Overview of the GDPR - General Data Protection Regulation](#)

- [Data Protection Act 2018](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)
- [Reads Court Ltd and JotForm Data Processing Addendum](#)