

## **Introduction**

Welcome to the Blue Anchor Privacy Notice.

Blue Anchor Leisure Limited respects your privacy and are committed to protecting your personal data. This Privacy Notice will inform you how we look after your personal data when you interact with us in on our sites, on our websites and over the telephone (regardless of where you visit us from) and tell you about your privacy rights and how the law protects you.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Notice.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

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## **1. Important information and who we are**

### **Purpose of this Privacy Notice**

This Privacy Notice explains how Blue Anchor collects and processes your personal data when you interact with us, including any data you may provide when you purchase a product or service on any of our sites, over the telephone or through this website, when you sign up to our email newsletter or take part in one of our competitions. It also explains how we store and handle that data and keep it safe.

This website is not intended for children and we do not knowingly collect data relating to children through this website.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements any other notices and is not intended to override them.

### **Controller**

Blue Anchor Leisure Limited (Company Number: 01091655) is the controller and responsible for your personal data (referred to as Blue Anchor, "we", "us" or "our" in this Privacy Notice).

We have appointed a Data Protection Lead who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Data Protection Lead using the details set out below.

## Contact

You can contact us by:

- email: [ray@blueanchorleisure.co.uk](mailto:ray@blueanchorleisure.co.uk)
- post: Ray Chapman, Seaways, Roman Bank, Winthorpe, Lincolnshire, PE25 1HZ
- telephone: (01754) 897897

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to investigate and deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

## Changes to the Privacy Notice and your duty to inform us of changes

This version was last updated on 25.05.2018 and historic versions can be obtained by contacting us. It's likely that we'll need to update this Privacy Notice from time to time. [but you're welcome to come back and check it whenever you wish.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 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 Notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, maiden name, username or similar identifier, marital status, title, date of birth and gender. If you provide a passport or driving licence to prove your identity (for example in order to obtain finance via our finance partners), the data will also include your place of birth, facial image and nationality. Your image and car registration number may also be recorded on CCTV when you visit one of our sites or car parks.

- **Contact Data** includes billing address, delivery/postal address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details and credit scoring information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes 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.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Health Data** means information about your health you may provide to one of our employees – for example, you may have a specially adapted caravan for a disability.

This above groups of data are not necessarily an entirely comprehensive list of every category of data we may hold.

Except as expressly detailed above, 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). We may be given this information as part of our service i.e to gain wheelchair access to one of our sites but we do not record this information.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. When and how we collect your personal data**

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

- **Direct interactions.** You may give us your Identity, Contact, Financial, Health, Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for or buy our products or services in on site, online or over the telephone;
  - visit our website;
  - subscribe to our email newsletter;
  - request marketing to be sent by us to you;
  - book any kind of appointment with us or book to attend an event;

- enter a competition, promotion or survey (this may include data referring to children but only after we have obtained appropriate consent from an adult with parental responsibility);
- give us some feedback;
- fill in any forms where we may need to collect your personal data;
- use our stores and car parks which usually have CCTV systems operated for security purposes; or
- apply for a job with us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties, which may include those as set out below:
  - Technical Data from advertising networks such as MailChimp, some of which may be based outside the EU; and
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services
  - Identity and Contact Data from publicly available sources such as Companies House, Credit Agencies and the Electoral Register based inside the EU.

#### 4. **How we use 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 perform a contract which we have entered into 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 or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### 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 plan to use your personal data, and which of the legal bases we rely on 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 ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful ground for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Deliver a product to you (we may need to share your details with a third party providing a service, such as delivery couriers, warranties or a fitter visiting your home)	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us and protect you from fraud)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Sending you legally required information relating to your orders or information about product recalls. (c) Asking you to leave a review or take a survey (d) Responding to your queries, refund requests or complaints.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services, to provide you with the best service and to understand how we can improve our service based on your experiences)

To enable you to take part in a prize draw, competition or complete a survey and to allow us to administer any of our prize draws or competitions	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you; send you relevant communications by post in relation to updates, offers, services or products; measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy and to run our loyalty scheme)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To protect our customers, and our business from crime, we operate CCTV systems in our stores and car parks which record images for security.	(a) Identity	Necessary for our legitimate business interests.
To share data with law enforcement.	(a) Identity (b) Contact (c) Financial	(a) Necessary to comply with a legal obligation.  (b) Necessary to perform a contract with

	(d) Transaction (e) Technical	you.
For credit check and fraud management and to handle insurance claims.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical	(a) Necessary to comply with a legal obligation. (b) Necessary to perform a contract with you. (c) Necessary for our legitimate business interests.

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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 you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Blue Anchor for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### 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.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties examples of which are set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the *Glossary*.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact us.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

## **7. Data security**

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

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. For example, we secure access to all transactional areas of our websites using 'https' technology and secure sensitive data (such as payment card information) by SSL encryption.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

For example, when you place an order, we'll keep the personal data you give us for six years so we can comply with our legal and contractual obligations. If your order includes a warranty, the associated personal data will be kept until the end of the warranty period.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

In certain circumstances, you have rights under data protection laws in relation to your personal data as set out below:

- Access to the personal data we hold about you, free of charge in most cases.
- Correction of your personal data when incorrect, out of date or incomplete - please update your online account or contact our Customer Services team.
- Erasure of your personal data, for example when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.
- That we restrict the way we process your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- That we transfer your personal data to a third party by providing to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please 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.
- Review of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We strive to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best product/service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **External Third Parties**

- Service providers acting as processors based in the UK who support our website and other business systems.
- Operational companies based in the UK such as delivery couriers, service agents and fitters visiting your caravan.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Fraud prevention agencies based in the UK in relation to purchases via credit/debit cards, loans or store cards we provide to you.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Direct marketing companies based in the UK who help us manage our electronic communications with you.
- Social Media providers based either in or outside the UK such as Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our website.