

# DATA PROTECTION

## How we use your personal data

Under UK data protection law we are required to provide you with specific information about how we will use and process any personal data we hold on you.

We have set out that information in this document. If you have any queries please contact our Data Protection Officer (details below).

### **The purpose(s) for which we use your personal data and the lawful basis for such processing**

Paxton House may use your personal data for the following purposes:

#### **As a Paxton House Visitor**

We collect and use your personal data in order to enter into, administer and manage your visit(s) including managing and performing the underlying contract with you.

Where you purchase an annual visitor ticket this includes using your personal data to administer and manage any annual entry passes including processing your personal data in order to identify you on subsequent visits.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance (defined below).

#### **Retail Activities**

We may on occasions collect and use your personal data to enable us to enter into, administer and perform a contract with you when you buy goods or services from us.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance (defined below).

#### **Events (e.g. Annual Christmas Cracker etc.)**

We collect and use your personal data to enable us to enter into, manage and administer a contract with you when you come to our events.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance (defined below).

#### **Experiences**

We collect and use your personal data to enable us to enter into, administer, manage and perform a contract with you when you buy such goods or services from us.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance (defined below).

## **Accommodation Services & Glamping**

We collect and use your personal data to enable us to enter into, administer and manage our contract with you when you book accommodation or glamping services with us. This includes using your personal data to administer and manage your booking with us.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance (defined below).

## **Hospitality Functions: Conferences / Weddings / Dining / Banqueting**

We collect and use your personal data to enable us to enter into, administer and manage any hospitality bookings or arrangements including the underlying contractual arrangements between us.

If you are visiting us as a hospitality attendee, we may collect and use your personal data to manage your visit/attendance.

Our use of your data for these purposes is undertaken on the basis of Necessity and Legal Compliance and Legitimate Interests (defined below).

## **Marketing and Promotions**

We may use your personal data to provide you with marketing information, promotions and new events and offerings information.

We will only use your personal data to provide you with marketing information, promotions and new events and offerings information where you have given us your specific consent to do so.

Our use of your data for these purposes is undertaken on the basis of Consent.

You can manage your marketing preferences at any time by emailing [helen@paxtonhouse.com](mailto:helen@paxtonhouse.com)

## **The legal basis for the processing we carry out**

Consent: means that you, the “data subject”, have given us your consent to the processing of your personal data for one or more specific purposes.

Where we process your personal data on the basis of Consent you have the right to withdraw that consent at any time.

Necessity: means that the processing we carry out is necessary for the performance of a contract we have with you or in order to take steps at your request prior to entering into a contract with you.

Legal Compliance: means that the processing we carry out is necessary for compliance by us with a legal obligation placed on us.

Legitimate Interests: means that the processing of your personal data is necessary for the purposes of our legitimate interests or by a third party and those interests are considered to be sufficient to override your interests or fundamental rights and freedoms which require protection of your personal data.

## **Where we rely on Necessity or Legal Compliance**

Where we process your personal data on the basis of Necessity or Legal Compliance please be aware that if you object to our processing your personal data on this basis (and no other lawful basis for that processing applies) it is likely that we will not be able to provide you with (or continue providing you with) the goods or services that we would have or are providing to you.

## **Where we rely on Legitimate Interests**

As a responsible data controller, we rely on our legitimate interests in the area of our CCTV usage to assist in managing and monitoring the health, safety and security of our visitors, guests and staff whilst at Paxton House.

We note that we may rely on Legitimate Interests in our Hospitality services where it may be necessary to provide your personal data to our suppliers, contractors, caterers etc. in order to facilitate and carry out the services we are providing for you. Please note we never sell or give your personal data to such parties for any other reasons.

## **What categories of personal data do we have about you?**

Where we have obtained your personal data from you, you will be aware of the data provided to us. Where we have obtained your personal data from a third party we will have provided you with a description of that data separately.

## **Who do we pass/share your personal data with?**

Paxton House does not share your information with any third party company or organisation other than those listed below and for the purposes stipulated.

Other categories of recipient of the personal data you provide to us are:

Our insurers where necessary in connection with our insurance cover and provision.

We may pass your personal data to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you that we have agreed to provide.

When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and in to keep in accordance with the requirements of UK Data Protection Law and not to use it for their own direct marketing purposes.

We may transfer your personal information to a third party as otherwise permitted by UK Data Protection Law, for example to our legal advisors or in order to comply with a legal requirement or obligation placed on us by law.

We may transfer CCTV to a third party security organisation (e.g. Police) in respect of any request made in writing in connection with a crime or security issue.

## **Do we transfer your personal data to other countries?**

No. We do not transfer your personal data outside of the European Union.

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

We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please contact us at:

Email: [helen@paxtonhouse.com](mailto:helen@paxtonhouse.com)

Post: Paxton House, Paxton, Berwick upon Tweed, TD15 1SZ

## **Your Individual Rights**

Under the Data Protection Act 2018 and the related European General Data Protection Regulation you have the following individual rights:

To make a subject access request;

To request the rectification of your personal data;

To request that we erase your personal data (the “right to be forgotten”);

To request that we restrict the processing of your personal data;

To request data portability;

To object to our processing of your personal data.

Further details on these rights, when they apply, how to exercise them and the exemptions and wider rules and requirements that apply to such rights. Please visit the Information Commissioner’s website at [ico.org.uk](http://ico.org.uk)

## **Raising Concerns with the Information Commissioner**

You have the right to lodge a complaint with the Information Commissioner if you are unhappy with how we are handling our data protection obligations, please visit the Information Commissioner’s website at [ico.org.uk](http://ico.org.uk)

## **Automated decision making and profiling**

We do not currently use automated decision making systems or profiling.

## **Who we are**

Under UK Data Protection Law, we are required to tell you the identity of the legal person who controls your personal data.

Paxton House Trust (Registered Charity Number SC002177);

Due to the way we are structured, Paxton House Trust maintains, preserves and operates Paxton House itself and any commercial enterprises that are carried out at Paxton.

## **Contacting Us / Our Data Protection Officer**

To contact us regarding any data protection matters:

The Data Protection Officer for Paxton House Trust is David Seed, Property Manager. His contact details are:

Email: [ds@seedandco.co.uk](mailto:ds@seedandco.co.uk)

Telephone: 01361 882 920

Post: Paxton House, Paxton, Berwick upon Tweed, TD15 1SZ