

The Lugger Inn Privacy Notice

We are committed to safeguarding the privacy of our customers and website visitors; this policy sets out how we will treat your personal information.

Introduction

This notice refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Personal Data

The Lugger Inn Ltd uses the information collected from you to provide quotations, make telephone contact and to email you marketing information which we believe may be of interest to you and your business. In you making initial consent to marketing contact from The Lugger Inn Ltd we shall maintain a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. We may from time to time use such information to collect statistics about the behaviour of visitors to our website.

The Lugger Inn Ltd websites use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. We may use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. We will use the persistent cookies to: enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

Any information The Lugger Inn Ltd holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

We will only collect the information needed so that it can provide you with marketing and consulting services, we do not sell or broker your data, although coincidentally there may be

times when your information could be contained in data that The Lugger Inn Ltd has purchased from a third-party list broker, on behalf of a client.

Legal basis for processing personal data

In order for us to process personal data we must have a lawful purpose for doing so. This is outlined below.

Legitimate interests

When you provide your personal details to us we use your information for our legitimate business interests. Before doing this, we will carefully consider and balance any potential impact on you and your rights.

The following are some examples of when and why we would use this approach.

Direct Marketing: We will send Direct marketing via the postal service and by email. We will also make sure our direct marketing is relevant for you and where possible tailored to your interests.

Ordering online: In order for us to process an order, payment details are taken and contact information collected, such as name, address, telephone number, and email address.

Your best interest: Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure.

Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our guests and visitors.

Analytics: To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

Research: To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.

Due Diligence: We may need to conduct investigations on potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption. Any communication we send in this manner will give you the opportunity to unsubscribe very easily.

Consent

We also rely on consent for lawful processing where we have no legitimate interest. An example of this may be when you sign up to receiving marketing through our website. Every marketing email we send gives you the opportunity to withdraw consent by unsubscribing.

Disclosure

We may on occasions pass your Personal Information to third parties exclusively to process work on our behalf. We require these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

We do not broker or pass on information gained from your engagement with us without your consent. However, we may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of The Lugger Inn Ltd, our clients and/or the wider community.

Retention Policy

We will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

Data storage

Data is held in The United Kingdom using different (multiple) servers. The Luggier Inn Ltd does not store personal data outside the EEA.

Your rights as a data subject

At any point whilst The Luggier Inn Ltd is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** - you have the right to request a copy of the information that we hold about you.
- **Right of rectification** - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** - where certain conditions apply you have a right to restrict the processing.
- **Right of portability** - you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** - you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** - you also have the right not to be subject to the legal effects of automated processing or profiling. In the event that The Luggier Inn Ltd refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

The Luggier Inn Ltd at your request can confirm what information it holds about you and how it is processed

You can request the following information:

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of The Luggier Inn Ltd or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

We will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If The Lugger Inn Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to info@thelugger.co.uk or by phoning 01736 36 32 36 or writing to us at the address below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by The Lugger Inn Ltd or its partners, you have the right to complain to us. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

The Lugger Inn
The Promenade
Penzance
Cornwall
TR18 4DL

Data Protection Regulator

Information Commissioner's office
Wycliffe House,
Water Ln
Wilmslow
SK9 5AF