

Oving Lodge

Visitor Privacy Notice

“Oving Lodge” is committed to ensuring that your personal data is processed fairly and lawfully, is accurate, is kept securely and is retained for no longer than is necessary. We only collect a small amount of data from our Residents but consider your privacy to be extremely important.

This “Privacy Notice” sets out what data we collect, how we process it and who we may share it with and why.

It also explains your rights with respect to the Personal Data that we may collect from you; that is data that identifies you as an individual or from which you may be identified.

Why do we need this Privacy Notice?

On the 31st December 2020 the UK General Data Protection Regulation (UK GDPR) came into force and complements the Data Protection Act 2018 (DPA18) which gives effect to its provisions.

This new regulation is intended to better protect individuals by ensuring that Companies, Public Authorities, Charities etc. look after your data properly and within clear guidelines. You may see the term “Data Subject”, this refers to someone whose information or data is held by an organisation.

UK GDPR requires us to ensure that personal data will be:

1. Processed fairly, lawfully and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Who are we?

Oving Lodge Bed & Breakfast, Church Lane, Oving, Nr. Chichester, West Sussex, PO20 2DG, for simplicity we will be referred to as “Oving Lodge” in the remainder of this document.

Data Controller.

As a small B&B that only holds limited personal information of Residents for our own accounts and records we are exempt from registration with the **“Information Commissioner’s Office”** (ICO) – the ICO is the Regulator in the UK for Data Protection, however if you have any questions about your data please contact the responsible person Mrs. Rosslyn O’Shea as follows:

By Email: rosslyn@ovinglodge.co.uk

Or in writing to:

Mrs Rosslyn O’Shea, Oving Lodge B&B, Church Lane, Oving, Nr. Chichester, West Sussex, PO20 2DG

Why do we need to hold and process your personal data?

Oving Lodge processes personal data in order to fulfil its contractual obligations to our Clients, this is the “*lawful basis*”. Such information is limited to

Oving Lodge may from time to time be marketed by “Third Party Organisations” as part of local, regional or international tourism campaigns, this is often done on the basis of “Legitimate Interest”, please note that we do not supply your personal details for such purposes.

Where you have asked us to contact you with information about future events that take place in our local area such contact is made on the basis of “Consent”.

We may also process personal data if at least one of the following applies:

- In order to protect the vital interests of an individual.
- For financial transactions relating to your stay at Oving Lodge.
- For the establishment, exercise or defence of legal claims or whenever Courts or Public Authorities such as HMRC or the Police are acting in their judicial or investigative capacity.
- For reasons of public interest in the area of public health.
- For reasons of substantial public interest, based on law, which is proportionate in the circumstances and which provides measures to safeguard the fundamental rights and the interests of the Data Subject.

What sort of personal information could we be collecting about you and processing?

The categories of information that we collect, hold and process include:

- Personal information (such as name, address, phone number, email address).
- Payment card or bank details.
- Booking dates.
- Visitors given access to our Wi-Fi system may have the following recorded to ensure legal compliance:
 - IP Address.
 - MAC Code(s) of connected device(s).
 - Identifying name(s) of connected device(s).
 - Browsing history.
 - Bandwidth used.
 - Logon times and location information.

Do we pass on or share your personal information with anyone else?

Oving Lodge will never sell your personal data to a Third Party.

Except as indicated, we will not reveal your personal information or details to anyone outside Oving Lodge unless we are required by the law to do so.

We use a Third Party ICT contractor to carry out certain functions, they are controlled by a Data Processing Agreement (DPA) which limits the extent to which they may use and process your data to the purposes that we require. They are:

- MARCOM *Computing* – IT Contractor – Secure Back-up / Recovery Services – Advice on Data Security & Management of the Wi-Fi and fixed Networks.

How long will we retain your data?

Some data such as records of financial transactions will be kept for seven years for audit and tax purposes,

Oving Lodge’s principle is not to retain any data or personal information for longer than is necessary in relation to the purposes for which it was collected. We will always be driven by best practice to ensure that information will be held in accordance with the latest guidelines.

What are my rights regarding the data you hold about me?

Under UK GDPR you have significantly enhanced rights which include:

1. Being informed of data processing (which is covered by this Privacy Notice).
2. Accessing information (also known as a Subject Access Request (SAR)) that we hold on you. In some circumstances there can be a charge for this.
3. Having inaccuracies corrected promptly.
4. Having information that we hold about you erased except where there is a statutory or legal requirement for us to collect process or hold it.
5. Restricting processing of your data except where there is a contractual, statutory or legal requirement to process it.
6. Data portability where relevant.
7. Intervention in respect of automated decision making (not operated by Oving Lodge).
8. Withdrawing consent / Right to be forgotten (see below).
9. Complaining to the Information Commissioner's Office (ICO) (See below).

What if I live outside the UK?

1. After leaving the EU the UK modified the GDPR to become the UK GDPR and your rights and protection are broadly similar to that enjoyed elsewhere in the EEA or Internationally under existing agreements. Please note the following:
 - The UK currently operates under a temporary agreement with the EU called the "Adequacy Bridge" until the European Data Protection Board (EDPB) delivers an "Adequacy Opinion". During this time personal data may be transferred between the UK & Member States freely.
 - Legacy Data obtained before 31 Dec 20 will be treated as "Frozen GDPR Data" and maintained under the EU rules in force on that date until the UK is formally given an "Adequacy Decision". Note that the DPA 2018 applies to this data.

Can I stop you holding and processing my data?

Withdrawal of Consent

The lawful basis upon which Oving Lodge processes personal data is that it is necessary in order to comply with our legal and contractual obligations and where we have legitimate interest.

Where we process personal data solely on the basis that you have consented to the processing, you will have the right to withdraw that consent.

To exercise any of these rights please contact us by email.

If you are unhappy with the way your request is handled, you may wish to ask for a review of our decision by challenging it in writing within 28 days.

Complaints to the ICO

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner for a decision. Generally the ICO cannot make a decision unless you have exhausted our internal review procedure. The Information Commissioner can be contacted at:

The Information Commissioner's Office,
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF