



## **Lough Shore Road Limited Data Privacy Notice**

**Welcome to Lough Erne Resort's privacy notice.**

### **Overview**

At Lough Erne Resort we take your privacy seriously and we are committed to protecting your personal data. We aim to be clear about how we use personal data and this privacy notice will inform you as to how we look after your personal data, what personal data we process and why. It includes the relevant requirements of the General Data Protection Regulation. It applies to both your visit on our website (regardless of where you visit it from) and when you use our services.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice. It will give you information about:

- 1. Who we are and who is responsible for your personal data**
- 2. Where you can contact us if you have any questions about how your personal data is processed by us**
- 3. What types of personal data we process and where we get that personal data from**
- 4. How we use your personal data and what our legal basis for doing so**
- 5. Who we disclose your personal data to and why**
- 6. Whether we transfer any of your data internationally**
- 7. How we store your data securely**
- 8. How long we hold your personal data for**
- 9. the Glossary**

### **Changes to This Data Protection Notice**

Like any business, our business will change over time and so will the way we use and protect your personal data. As a result, we may need to make changes to this General Data Protection Notice. These changes will not reduce your rights or the level of protection we apply to your personal information. The most up to date General Data Protection Notice will always be published on our website.

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

This privacy notice aims to give you information on how Lough Erne Resort collects and processes your personal data through your dealings with us, including your use of this website, any data you may provide through this website when you make a booking to stay in Lough Erne Resort, sign up to our newsletter, use our golf courses or spa, book in one of our restaurants or any other service we offer or take part in a competition.

This website is not intended for children.

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 the other notices and is not intended to override them.

### **Controller**

Lough Erne Resort is the controller and responsible for your personal data (collectively referred to as "Lough Erne Resort", "we", "us" or "our" in this privacy notice). When we refer to Lough Erne Resort we mean:

Lough Shore Road Limited

Company Number: NI626281

Lough Erne Resort, Belleek Road, Enniskillen, County Fermanagh, Northern Ireland, BT93 7ED

Lough Erne Resort comprises a number of outlets within the resort, you will receive marketing materials from all outlets in the resort if you have opted into receiving marketing from 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. Where you can contact us if you have any questions about how your personal data is processed by us**

We have appointed a data privacy manager 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 privacy manager William Kirby by emailing [gm@loughernerresort.com](mailto:gm@loughernerresort.com).

## **3. What types of personal data we process, where we get that personal data from**

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).

As a hotel which also offers event, spa and golf services, we may need to collect use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data** includes billing address, email address and telephone numbers.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.

**Technical Data** includes internet protocol (IP) address and other technology on the devices you use to access this website.

**Marketing and Communications Data** includes your preferences in receiving marketing from us.

We also collect, use and share **Aggregated Data** such as statistical data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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) unless we have your explicit consent to do so. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

#### **How is your personal data collected?**

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

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by

corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- book to stay at Lough Erne Resort;

- use any of our other services i.e. our restaurant, golf courses, spa or event rooms;

- request marketing to be sent to you;

- enter a competition, promotion or survey; or

give us some feedback.

**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.

#### 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 the contract we are about to enter into or 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 emailing [unsubscribe@loughneresort.com](mailto:unsubscribe@loughneresort.com)

#### 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.

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 William Kirby by emailing [gm@loughneresort.com](mailto:gm@loughneresort.com) if you need details about the specific legal grounds 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 basis 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 booking including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(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

<p>To manage our relationship with you which will include:</p> <p>(a) Notify you about information relevant to your booking with us;</p> <p>(b) Notifying you about changes to our terms or privacy policy</p>	<p>(a) Identify</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>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)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>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 relationships and experiences)</p>

		inform our marketing strategy)
To make suggestions and recommendations to you about 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)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### 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 services from us or if you provided us with your details when you entered a competition or registered for a promotion. In each case, you have opted-in to receive that marketing.

### Third-party marketing

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

### Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing [unsubscribe@loughernerresort.com](mailto:unsubscribe@loughernerresort.com) 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. For more information about the cookies we use please see Cookie Policy.

### 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 William Kirby by emailing gm@loughneresort.com.

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. Who we disclose your personal data to and why**

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

Internal Third Parties as set out in the Glossary.

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**

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

## **7. How we store your data securely**

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. 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.

In some circumstances you can ask us to delete your data. If this is the case please contact [gm@loughneresort.com](mailto:gm@loughneresort.com).

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.

### 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 try 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

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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 William Kirby, gm@loughneresort.com](mailto:gm@loughneresort.com)

**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**

### **Internal Third Parties**

Other companies in the Lough Shore Road Limited acting as joint controllers or processors and provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

Service providers acting as processors based who provide IT, marketing and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.