

# Privacy Policy

Data protection is a particularly high priority for Park Holidays UK. When we process our data subjects or site visitor personal data, we ensure it will always be consistent with the EU General Data Protection Regulations (GDPR), and in accordance with the Data Protection Act 2018 in the UK. By means of this Privacy Policy and data protection declaration, Park Holidays UK would like to inform our data subject of the nature, scope, and purpose of the personal data we collect, use, process and share. Furthermore, our data subjects are informed, by means of this policy of the rights to which they are entitled.

Park Holidays UK has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website and other channels. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

## 1. Definitions

The data protection declaration of Park Holidays UK is based on the terms used by the European legislator for the adoption of the General Data Protection Regulations (GDPR). Our data protection declaration should be legible and understandable for everyone including our data subject and business partners. To ensure this, we would like to explain the terminology used.

In this data protection declaration, we use the following terms:

### a. Consent

Consent by the data subject is freely given, specific, informed and an unambiguous indication of their wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of their personal data.

### b. Controller responsible for the processing

The Controller responsible for the processing is Park Holidays UK, which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are governed by the European Union or UK law.

### c. Data subject

A data subject is any identified or identifiable natural person, whose personal data is processed by Park Holidays UK.

### d. Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**e. Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**f. Processor**

A Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Park Holidays UK use partners and third party providers to act as processors on our behalf.

**g. Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**h. Anonymisation**

Anonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately in a secure database.

**i. Recipient**

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the European Union or UK law shall not be regarded as recipients; the processing of such data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**j. Restriction of processing**

Restriction of processing is the highlighting of stored personal data so that no further processing of that data by Park Holidays UK or data processors is undertaken in the future.

**k. Third party**

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 2. Name and Address of the controller

The Controller for the purposes of the EU General Data Protection Regulation (GDPR), is:

Park Holidays UK Ltd  
Glovers House  
Bexhill-On-Sea  
TN39 5ES  
United Kingdom  
Phone: 01424234234  
Email: [info@parkholidays.com](mailto:info@parkholidays.com)  
Website: [www.parkholidays.com](http://www.parkholidays.com)

### 2.1 Processing by other controllers and joint controllers

If you make an application for credit funding in relation to holiday home ownership we may share your personal data with our finance partners (Controllers/Joint Controllers). They may use your data in their processing for your application of credit . They may also disclose your information to Credit Reference Agencies and Fraud Prevention Agencies to process your application. They or we may also make use of Debt Recovery Agencies to trace and recover debts. Please see a list of controllers below:

### Controllers & Joint Controllers

#### Category

#### Purpose

#### Data Disclosed

#### 1. Payment Processors

Clydesdale Financial Services Limited t/a Barclays Partner Finance (Joint Controller)

To process Park Holidays data subjects' application for credit.

Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, company registration number, VAT number, funding instrument including bank account and credit/debit card details (if appropriate) and relevant transaction information (if appropriate).

Zebra Finance Ltd.

To process Park Holidays data subjects' application for credit.

Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, company registration number, VAT number, funding instrument including bank account and credit/debit card details (if appropriate) and relevant transaction information (if appropriate).

Santander Consumer (UK) Plc

To process Park Holidays data subjects' application for credit.

Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, company registration number, VAT number, funding instrument including bank account and credit/debit card details (if appropriate) and relevant transaction information (if appropriate).

Black Horse Ltd	To process Park Holidays data subjects' application for credit. <i>We are required to provide you with a copy of the Black Horse Data Privacy Notice before we submit an application for finance on your behalf</i>	Name, address, telephone number, email address, date of birth, length of time at address, proof of identity, legal form, length of time in business, company registration number, VAT number, funding instrument including bank account and credit/debit card details (if appropriate) and relevant transaction information (if appropriate).
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<b>2. Service Operator(s)</b>		
My Holiday Caravan (joint controller)	Prospect marketing and enquiry generation.	Name, address, telephone number, email address.
GFM (controller) Hoseasons (controller) Booking.com (controller) Breakfree (controller) Airbnb (controller) Pitchup.com (controller)	Marketing and business information for sales purposes, with data subject consent. Take holiday bookings on behalf of Park Holidays.	Name, address, telephone number, email address plus relevant financial transaction information.
Harvey Longsons (controller) Purple Bricks (controller) Humphreys & Orr (controller)	Marketing and business information, acquire and enrich business information of new and existing clients.	Name, address, telephone number, email address.
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<b>3. Debt Recovery</b>		
Shoosmiths LLP (Joint Controller)	To collect and manage debt recovery	Name, address, telephone number, account number, date of birth, email address, account type, account status, last four digits of financial instruments account, sort code, account balance, details of account transactions and liabilities, name of funding source provider and copies of all correspondence, in each case relating to amounts you owe (or another person owes) to us.

### 3. Name and Address of the Data Protection Officer

Data Protection Officer  
Park Holidays UK Ltd  
Glovers House  
Bexhill-On-Sea  
TN39 5ES  
United Kingdom  
Email: [dpo@parkholidays.com](mailto:dpo@parkholidays.com)  
Website: [www.parkholidays.com](http://www.parkholidays.com)

A data subject may, at any time, contact our Data Protection Officer directly via email with questions concerning the protection of their data.

#### 4. Cookies

Park Holidays UK websites use cookies. Cookies are text files that are stored on a computer system via an internet browser.

Many internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which internet pages and servers can be assigned to the specific internet browser in which the cookie was stored. This allows visited internet sites and servers to differentiate the individual browser of the data subject from other internet browsers that contain other cookies. A specific internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Park Holidays UK can provide the users of this website with more user-friendly services that would not be possible without the use of cookies.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. A website user that uses cookies does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a data subject has placed in the virtual shopping cart via a cookie.

Our data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of their Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers.

If a data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be usable.

If you require any further information on cookies including how to see what cookies have been set and how to manage, delete and turn them off visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note these are external websites and Park Holidays UK is not responsible for the accuracy of the information on these sites.

Park Holidays UK Ltd make use of both first party cookies and cookies from carefully selected third- parties, primarily for analytical, tracking and remarketing purposes. All our cookies are anonymous, containing no personally identifiable information. Please see the table below for a detailed breakdown of the cookies used by Park Holidays UK Ltd.

If you decide to share our content using social media sharing tools on our Sites, you may be presented with cookies from third party sites such as Facebook, Twitter or Google+. Park Holidays UK does not control how these sites use cookies, therefore you should refer to the appropriate site's own privacy and cookie policy to understand how they use cookies.

All cookies have an owner which tells you who the cookie belongs to. The owner is the domain specified in the cookie. In "third-party cookie", the word "party" refers to the domain as specified in the cookie; the website that is placing the cookie. So, for example, if you visit widgets.com and the domain of the cookie placed on your computer is widgets.com, then this is a first-party cookie. If, however, you visit widgets.com and the cookie placed on your computer says stats-for-free.com, then this is a third-party cookie.

Cookie Source	Type	Description
Google Analytics	1st Party	Google Analytics is a free service offered by Google that generates detailed statistics about visitors to a Web site for marketers. Google Analytics makes it possible to track users across search engines, email campaigns and display advertising giving advertisers the opportunity to optimize campaigns on multiple platforms.
Facebook	1st Party	We use cookies if you have a Facebook account, use the Facebook Products, including our website and apps, or visit other websites and apps that use the Facebook Products (including the Like button or other Facebook Technologies). Cookies enable Facebook to offer the Facebook Products to you and to understand the information we receive about you, including information about your use of other websites and apps, whether or not you are registered or logged in.
Twitter	1st Party	We (along with third parties) use these technologies on our websites, applications, and services and on other websites, applications, and services that have integrated our services, including third-party properties that incorporate our advertising technology. This includes our ad partners' websites and sites that use our embeds, including embedded timelines. Third parties may also use these technologies, for example, when you click on links from our websites or applications, view or interact with third-party content from within our services or visit third-party websites that incorporate our advertising technology.

Google Adwords	3rd Party	AdWords is Google's main advertising product. AdWords offers pay-per-click (PPC) advertising, cost-per-thousand (CPM) advertising, and site-targeted advertising for text, banner, and rich-media ads. The AdWords program includes local, national, and international distribution. Google's text advertisements are short, consisting of one headline and two additional text lines. Image ads can be one of several different Interactive Advertising Bureau (IAB) standard sizes.
Bing	1st Party	Microsoft uses cookies (small text files placed on your device) and similar technologies to provide our websites and online services and to help collect data. Cookies allow us, among other things, to store your preferences and settings; enable you to sign-in; provide interest-based advertising; combat fraud; and analyse how our websites and online services are performing. Microsoft apps use other identifiers, such as the advertising ID in Windows described in the Windows section of this statement, for similar purposes. We also use web beacons to help deliver cookies and gather usage and performance data. Our websites may include web beacons and cookies from third-party service providers.

## 5. Collection of general data and information

Park Holidays UK website collects a series of general data and information when a data subject or automated system accesses the website. This general data and information is stored in the server log files. General data collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using such general data and information, Park Holidays UK does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Park Holidays UK analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our company, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

## **6. Registration on our website**

Our data subjects can register on our website and submit data which is collected and stored and may be shared with one or more processors (e.g. a brochure fulfilment service) that also uses the data subject's personal data for an internal purpose which is attributable to the controller.

When you visit our website, our web server logs your IP address. This gives us information such as which pages you looked at, whether the page request was successful or not and which browser you use to view the page. The use of this data is purely for statistical purposes and to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offences internally or if we are required by law to do so.

The registration of the data subject, with the voluntary submission of personal data, is intended to enable Park Holidays UK to offer the data subject content or services that may only be offered to registered users due to the nature of the matter in question.

Data subjects that complete enquiry forms, competition entries or other forms on the Park Holidays UK website will receive a minimum of 1 communication either by telephone, e-mail, SMS or post to acknowledge the data subject's request and/or competition entry. At this time, the data subject will be asked to confirm their marketing preferences. If the data subject chooses not to opt-in to marketing communications, they will not receive general marketing communications from Park Holidays UK but will continue to receive responses to specific enquiries.

Registered data subjects are free to change the personal data specified during the registration at any time, or to exercise their right to be forgotten and request their personal data be completely deleted through the right of erasure.

Our website may contain links to other websites. Once you have clicked on these links please note that we do not have any control over the websites at which you will arrive. We cannot be held responsible for the protection and privacy of any information that you provide whilst visiting such sites. You should review the privacy statement applicable to the website upon arrival.

## **7. Direct marketing**

Park Holidays UK operate a marketing communications strategy in which carefully selected data subjects are presented with tailored offers for goods or services which we believe may be of interest. Marketing communications may be sent via ordinary postal mail, SMS text messages, email or live chat on our websites. Data subjects are requested to specify and subscribe to this activity if they so wish.

## **8. Subscription to electronic communications**

Park Holidays UK website users are given the opportunity to subscribe to electronic communications. Park Holidays UK informs its data subject regularly by means of an electronic communication about news and events that may be of interest to data subjects. The electronic communication may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the electronic communication. The personal data collected as part of a registration for the electronic communication will only be used to send our electronic communications. The subscription to our electronic communications may be terminated by the data subject at any time by using the 'unsubscribe' link on the electronic communication or via the Park Holidays UK website or communicate this to Park Holidays UK via alternative means, e.g. by telephone.



## 9. **Electronic communication-Tracking**

The electronic communications of Park Holidays UK contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such communications, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, Park Holidays UK may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by the data subject.

Such personal data collected in the tracking pixels contained in the electronic communications are stored and analysed by Park Holidays UK to optimize the sending of the electronic communication, as well as to tailor the content of future electronic communications even better to the interests of the data subject. After a deletion request is received, this personal data will be deleted by Park Holidays UK. Park Holidays UK automatically regards a withdrawal from the receipt of the electronic communications as a revocation of consent.

## 10. **Data subject contact via the website**

Park Holidays UK website contains information that enables direct communication with us and includes our email address. If a data subject contacts Park Holidays UK by e-mail or via a contact form, their personal data is automatically stored for processing or contacting the data subject. There is no transfer of this personal data to third parties, without the data subjects consent.

## 11. **Routine erasure of personal data**

Park Holidays UK shall process and store the personal data of the data subject only for the period necessary, or as far as this is granted by the European legislator or other legislators in laws or regulations to which Park Holidays UK is subject to. If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data is routinely erased in accordance with legal requirements.

## 12. **Rights of the data subject**

### a. Right of access

Each data subject shall have the right granted by the European legislator to obtain from Park Holidays UK details about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with the Information Commissioner's Office which is the UK's data protection regulator.
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether their personal data has been transferred outside the European Union to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. If a data subject wishes to avail themselves of this right of access they may, at any time, contact our Data Protection Officer via email.

#### b. Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from Park Holidays UK without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, they may, at any time, contact our Data Protection Officer via email.

#### c. Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to secure from Park Holidays UK the erasure of personal data concerning him or her without undue delay where one of the following grounds applies, if the processing is not necessary:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data has been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in the European Union or UK law to which the controller is subject.
- The personal data has been collected in relation to the offer of information society services directly to a child, referred to in Article 8(1) of the GDPR.

If one of the above reasons applies, and a data subject wishes to request the erasure of personal data stored by Park Holidays UK, they may, at any time, contact our Data Protection Officer via email.

Where Park Holidays UK has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, Park Holidays UK shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of Park Holidays UK will arrange the necessary measures in individual cases.

#### d. Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from Park Holidays UK restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling Park Holidays UK to verify the accuracy of the personal data.
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- Park Holidays UK no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of Park Holidays UK override those of the data subject.

e. Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning themselves, which was provided to Park Holidays UK, in a structured, commonly used and machine-readable format. The data subject shall have the right to transmit such data to another controller without hindrance from Park Holidays UK to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

f. Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Park Holidays UK shall no longer process the personal data in the event of an objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Park Holidays UK processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Park Holidays UK processing the data for direct marketing purposes, Park Holidays UK will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her situation, to object to processing of personal data concerning him or her by Park Holidays UK for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

g. Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by the European Union or UK law to which the controller is subject and which also lays down suitable measures to safeguard the data subjects rights and freedoms and legitimate interests, or (3) is not based on the data subjects explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and Park Holidays UK, or (2) it is based on the data subjects explicit consent, Park Holidays UK shall implement suitable measures to safeguard the data subject rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of Park Holidays, to express his or her point of view and contest the decision.

#### h. Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact our Data Protection Officer at [dpo@parkholidays.com](mailto:dpo@parkholidays.com)

### 13. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the above mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator who considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

### 14. Period for which the personal data will be stored

There are no specific minimum or maximum periods for retaining personal data. Instead, Park Holidays UK only retain personal data for the duration of the processing required thereafter this personal data is routinely deleted.

### 15. Provision of personal data as a statutory or a contractual requirement;

When Park Holidays UK need to process someone's personal data because we need to fulfil our contractual obligations to them or because they have asked us to do something before entering into a contract (e.g. pay for goods or services).

There is an obligation on the data subject to provide us with personal data when we sign a contract with them however if the data subject elects to withhold their personal data then the contract would not be concluded.

### 16. Existence of automated decision-making

Our financial third-party data processors do operate automatic decision-making or profiling practises.

### 17. If you wish to contact the Information Commissioners Office, you can do so here:

<https://ico.org.uk> Telephone: 0303 123 1113

#### 18. **Description of the personally identifiable information that we may collect:**

We may collect some or all of the information listed below to enable us to offer you tailored offers for goods or services dependant on your circumstances and interests.

Name; Age/date of birth; Gender; Marital status; Address details; Employment history; Emergency contacts and details of any dependants; Nationality; Financial information (because we may need to carry out financial background checks); IP address; frequency including dates and times that you access or purchase our services; Copy of your passport, social security number/driving licence/identity card; CCTV footage if you visit any of our Parks.

#### **Description of the special category data that we may collect:**

Race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

#### **Sharing data**

We may share your data with our third-party service providers and partners (processors) to enable them to contact you with products or services that relate directly to the product or service that you have purchased from us. ([Click here for a full list of our processors](#) )

#### **Changes to this Privacy Policy**

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Park Holidays UK reserve the right to amend or modify this Privacy Policy at any time and any changes will be published on our website. The date of the most recent revision will appear on this web page. If we make significant changes to this policy, we may also notify you by other means such as sending an email. Where required by law we will obtain your consent to make these changes. If you do not agree with any changes, please do not continue to use our website and let us know that you wish to have your personal data deleted.

*Last Updated: 26 June 2018*

# Processors

Category	Purpose	Data Disclosed
<i>1. Marketing</i>		
Active Campaign	To execute e-mail marketing & SMS/re-targeting campaigns.	Name, email address, telephone number, type of account, type, and nature of Park Holidays service offered or used and relevant transaction information. Website browsing behaviour.
Pure360	To execute e-mail marketing & SMS/re-targeting campaigns.	Name, email address, telephone number, DOB, nature of Park Holidays service offered or used and relevant transaction information.
Google Inc.	Help identify behaviour on Park Holidays website in order to guide decision about targeted marketing; to help efficiently handling and optimising desktop and mobile campaigns and elsewhere in the web and execute retargeting campaigns in order to deliver personalised advertising.	Anonymous ID generated by cookies, pixel tags or similar technologies embedded in webpages, ads and emails delivered to data subjects. Advertising ID and Device ID, encrypted e-mail address, Encrypted Customer ID, Encrypted Merchant ID, Transaction Value.
Facebook, Inc (US), Facebook Business Manager (SE).	To execute retargeting campaigns in order to deliver personalised advertising.	Advertising ID and device ID to segment data subject groups based on app behaviour, encrypted e-mail address associated with Park Holidays without indicating account relationship), IP Address, Anonymous ID generated by cookies, pixel tags or similar technologies embedded in webpages, ads and emails delivered to users. Mobile advertiser ID, IP Address and other metadata via Facebook SDK in mobile apps.
Sendmode UK	To send service related and (depending on opt-in settings) promotional SMS messages to Park Holidays data subjects.	Mobile Number, name, address, email address, DOB, business name, business contact details, domain name, account status, account type, account preferences, type and nature of Park Holidays services offered or used and relevant transaction and account information.
Live Chat	Live chat and lead generation.	Information provided by the data subject which may include Name, email address, chat transcripts, IP address, geographical location, website browsing history.
Hootsuite	Social media software management and processing.	Information provided by data subject on social media websites.
Upward Comms	Fullfilment and mailing house	Name, address, email address, telephone number.

## 2. Insurance

Compass Ins

Caravan owners - 14 days free Insurance.

Name, address, email address, telephone number, any other information required (as appropriate).

## 3. Operational Services

Data8 - Data Solutions

Data Quality Management Services - to provide services for data cleansing.

All data subject information

SQL Perform

Provides a resource to enable us to analyse data submitted by data subjects.

All data subject information

Elite Dynamics

ERP Provider.

All data subject information

Optomany

Services in connection with the operation of an omnichannel payment processing system for stationary trade (point of sale).

All account information and transaction information (as appropriate).

Dealtrak

This service provides a platform that facilitates finance and insurance transactions.

All account information and transaction information (as appropriate).

Service Monitor Group

After sales fulfilment, annual questionnaire.

Name, address, email address, telephone number.

The Works

Design, media buying, direct mail.

Name, address, email address, telephone number, any other information required (as appropriate).

Ventrus

Services in connection with technology support.

Name, address, email address, telephone number, any other information required (as appropriate).

Barclaycard/Savvy

Barclaycard Payment Solutions

All account information and transaction information (as appropriate).

*Last Updated: 26 June 2018*