Faircourt Management Ltd (we/us) is an administration company who deal with the sales and ordering of Leisure Homes, their component parts and accessories on behalf of our associate company(ies) and agents and we are committed to protecting and respecting your privacy and any data we hold regarding you.

EU directive EU2016/679, effective as of May 25th 2018 replaces the former 1998 Data Protection Act and our policy states how any personal data collected from you or provided to us will be processed. Please read this policy carefully to understand how we will handle your data and your rights in regard to it.

We reserve all rights to change website content, and the privacy policy at any time, and may advise this on the 'What's New' page of the website; you are responsible to keep abreast of these conditions regularly to be aware of any such changes. By continuing to use this website any such changes will be deemed acceptable of any revised conditions.

A Data Protection Officer (DPO), required by the new GDPR regulation for Faircourt Management Ltd to maintain this policy and monitor compliance with data protection laws has been designated as:

Carl Robinson, Faircourt Management Ltd, 45 Stockbridge Park, Elloughton HU15 1JQ, e-mail address: fml@carl100.karoo.co.uk

What is your personal data? We may obtain and process personal details about you such as your name, address, telephone number(s), fax number & email address. This may have been provided by you via the website; by personally providing such data viva voce, or from information via a third party source which might usually be one of our associates, agents, sub-contractors or suppliers. We do not buy details from such as mailing list resources, social media platforms nor access electoral registers. Data is normally limited to your contact details (name, address, e-mail address, telephone numbers); contractual details (invoices and documentation relating to the acquisition of goods or services); enquiries for purchases (this data is time limited until a purchase is made or the enquiry does not proceed) and to respond to general enquiries. Your data will not include any age, gender, ethnicity, religious, visual, lifestyle, disability or familial details. No transactional information, such as bank or finance details are held, nor are Documentary Identifiers such as: NI numbers; Driving Licence details or Passport/ID card information. Where a purchase or enquiry is made through such as a charitable trust, information may be held in duality of the trust or trustees and any beneficiary.

How do we use your personal data? To administrate or otherwise carry out our obligations arising from any contracts or other agreements with us, to supply you with products or services, to produce invoices and statements, for delivery of ordered goods and services (see our general terms & conditions) and to establish and administer your account with us. For processing orders or enquiries submitted by you and advise of any changes or modification to our products or services. To recover debt and assist where required in the prevention of money laundering, fraud or any other illegal activity. For administration, improvement and development of our business. To confirm and update your records and utilise certain data components for 'in-house' statistical analysis. To deal with any problems or information relating to goods or services supplied to you. For general activities necessary to day-to-day running of the business. We do not access analytics or forensic software to examine website traffic or for marketing purposes.

Sharing information. We may be required in the performance of our contractual obligations or to resolve enquiries to provide some of your data to third parties. We may have been asked to provide information for legal or regulatory purposes relating to existing or future legal proceedings. We will not sell, distribute or lease your personal information to third parties unless we have your permission or we are required by law. If Faircourt sells, assigns or transfers the assets of its business, or if its business is merged, or enters into a joint venture with another business entity, we reserve the right to sell or transfer the databases maintained by us in connection with our business (including any personal information provided by you).

Storage of your data. The data that we collect from you will be held securely at our registered office in the UK although should our server providers ever re-locate or be acquired by a new owner outside of the EU, information which you provide to us may be transferred to countries outside the EU. Such countries may not have similar data protection laws to the UK. Should we transfer your information outside of the EU in this way, we will seek to ensure that appropriate security measures are taken to maintain the protection of your privacy rights in line with this Policy. Unfortunately information sent via e-mail may not be completely secure and anything you send is undertaken at your own risk. Whilst in our possession your data will be secured in accordance with our security procedures which may be subject to review as circumstances dictate.

How long do we keep your data? There are certain statutory regulatory requirements for information retention such as imposed by VAT laws, HMR&C record keeping and Limited Company record archiving. These relate to 'business activities' where we have sold goods or supplied services to you and for which a transaction has taken place. Only if legitimate, provable commercial reasons exist would we retain personal data beyond these time scales. This does not extend to enquiries which do not achieve fruition in the fullness of time; after a reasonable lapse of time from responding to an initial enquiry, your data would be erased from our files.

<u>Children and vulnerable adults.</u> Although it is unlikely that a person of or under the age of 16 might enter into a contract with us, we are concerned to protect their privacy. If aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information. Similarly, we have a duty of care in regard to 'Vulnerable Adults' and where such a person's data is submitted to us it must be with the knowledge and approval of an appropriate adult; this person's personal data may also be stored for the purposes of executing our transactional obligations.

Your rights. We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied us, please contact us at the DPO address in this document. You may ask us to effect changes to data provided or held about you, to ensure its accuracy and be kept up to date. You may also request that we cease from processing your personal information and that we delete your data from our database or records; this may not be possible if we have a legal obligation to retain it for a period of time. Should you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect, however, it may not be possible to completely delete your information because of back-ups and records of deletions. You are entitled to see data held about you and for any such information request we may be entitled to charge a nominal fee to defray costs to provide you with this.

Cookies and other websites. Our website: www.holidayhomesinthesun.com is hosted by 1&1 Internet Ltd in the UK, whose parent company is based in the EU. There are preloaded cookies on our website for its optimal performance. Where we have links to other websites of our associate companies or suppliers, if you follow a link to any of these websites, please note that they will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. We do not warrant that the information provided in their websites is accurate, complete or current at any time and we will not be liable for any loss resulting from their use, including any loss or damage to computer equipment or systems due to any computer virus infection resulting from access to this website, links to other websites or from other websites to ours. You should take all reasonable security precautions when accessing any internet sites.

<u>Complaints.</u> We will seek to deal with any complaints in a timely manner, however, if you are unhappy how your Personal Data is processed you have a right to complain to the Data Protection Officer. If you remain unhappy with the response to your complaint, you have the right to further complain to The Information Commissioners Office. The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow Cheshire, SK9 5AF; their telephone number is 01625 545 745 or via their website at www.ico.org.uk.

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