HIGHLAND AUTO CAMPERS PRIVACY POLICY

This policy sets out the basis in which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (GDPR).

Our pledge to you:

- Is to hold your data securely
- Never share your data with our partners or third parties unless you agree
- Use your data to tailor the information we provide you and improve our services
- Put you in control by allowing you to update, delete and access your data

1. Definitions

Data controller: A controller determines the purposes and means of processing personal data.

Data processor: A processor is responsible for processing personal data on behalf of a controller.

Data subject: Natural person

Categories of data: Personal data and special categories of personal data **Personal data:** The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data: The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing: means any operation or set of operations which is performed on personal data or on sets of personal data, whether 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. **Third party:** means 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. Who are we?

Highland Auto Campers is the data controller. This means we decide how your personal data is processed and for what purposes. For all data matters contact hire@highlandautocampers.co.uk or call 07971 997349

3. What personal information will Highland Auto Campers collect about me?

The privacy policy tells you:

- The information we collect from you
- · Why we collect it
- How long we store it
- Our legal basis for processing your personal data
- Who if anyone we disclose your personal data to
- Your rights and how you can see, update or delete your personal data
- Our digital services. This includes our website and social media
- Contact us directly, via email, phone, letter
- Meet us in person at events

4. Information we collect from you and the categories of personal data concerned.

We may collect and process the following data about you: You may give us information about yourself by filling in forms on our website www.highlandautocampers.co.uk or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you use our site, participate in social media functions on our site, enter a competition, and when you report a problem with our site.

We require your personal data to communicate with you about your booking and to ensure adequate insurance cover for your rental vehicle. We collect and process the following data about you:

- Reservations
- We collect your name, email, billing and email address and financial information. This allows us to make your booking and collect payment.
- The data will be held securely for a period of up to 24 months and then deleted permanently.
- Insurance
- We collect your driving licence information, date of birth and proofs of address.
 This allows us to insure you on our hire vehicle.

- This data will be held securely for a period of up to 24 months and then deleted permanently.
- Competition entries
- When you enter a competition, we may collect your name and email address. You are also given the option to consent to future email marketing from us. We process this data as part of our contract to you and we retain it for 24 months after the competition has closed.
- However, if you consent to future marketing we will continue to process your data on that basis. We may use this data and other data we hold about you to tailor the communications we send and improve our service to you and others. We store this in a secure database. If you withdraw consent it will be deleted within a month.

5. When you use our digital services

Web Analytics

We use website log files, cookies, digital analytics (Google) to gather information about how people use our website www.highlandautocampers.co.uk We do not collect or store your personal information (e.g. your name or address) in our website analytics. However, we can recognise that behaviours belong to a single person. The information collected helps us investigate whether our website meets its users' needs as well as to evaluate how our website can be improved. We store information about what pages you visit, how long you are on the site, how you got here and what you clicked on.

Website log files collect your IP address, when you visited the site and the pages you visited. IP address is a numeric code assigned to a device based on your geographical location. If for example you are in Edinburgh your IP address will be the same as other users accessing the internet from Edinburgh.

Cookies are small text files which are delivered onto your computer by websites that you visit. Our use of cookies is integral to both the current visitor experience and how we shape and grow our web-based services in the future.

Remarketing Lists for Search Ads (RSLA)

Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to Highland Auto Campers website.

We may also use Cookies to serve ads based on a user's prior visits to our website, as well as to develop remarketing lists for customised campaigns.

Users may opt out of Google's use of cookies by visiting the <u>Google advertising optout page</u>. In addition, you may also opt out of third party vendor's use of cookies by visiting the <u>Network Advertising Initiative opt out page</u>.

6. What is our legal basis for processing your personal data?

Our lawful basis for processing your general personal data is for the consent of the data subject in order to make reservations, ensure insuarance cover for hirers, and continue to receive communication on news and updates from Highland Auto Campers.

More information on lawful processing can be found on the <u>ICO website</u>.

7. Sharing your personal data

Your personal data will be treated as strictly confidential. We will never share your personal data with our partners or any third parties.

8. Providing us with your personal data

We require your personal data as it is a requirement of delivering reservations and hirer insurance.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data
- The right to request that we provide you with your personal data and to transmit that data directly to another data controller (known as the right to data portability) where applicable (i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data where applicable (i.e. where processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics)

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact https://ico.org.uk/global/contact-us/email/ or call 07971 997349. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.