# **Horning Pleasurecraft Ltd Privacy Policy**

For the purposes of this policy, references to Horning Pleasurecraft Limited include reference to other companies and brands associated with or operated by Horning Pleasurecraft Ltd. This privacy policy outlines how Horning Pleasurecraft Ltd ('we', 'our', 'us') collects, uses, maintains and discloses personal data that you give the Horning Pleasurecraft Ltd when you use this website (which includes any other website operated by either company within the Broads Holidays Ltd Group).

Your privacy is important to us and we will respect and protect your personal information. We are committed to safeguarding data that you supply to us through which you are identifiable either directly or indirectly (your Personal Identifiable Information (PII)) and we encourage you to read this document.

This policy also contains information about cookies, including the type of cookies that we use on this website and how you can disable such cookies.

#### What information do we collect about you via this website?

We endeavour to collect and use your personal information only with your knowledge and consent and typically when you make an enquiry via our website, email or telephone, register for information or other services, request information, submit a job application or when you respond to communications from us. The type of personal information we may collect could include, for example, your name, address, telephone number and email address.

If you do provide us with any of your personal information, it will be used for the purposes stated at the time it was collected and will be subject to any preferences that you indicate.

From time to time and if you have consented to us doing so, we may store and use your information to contact you for market research and marketing purposes. We may do this by email, phone, post or mail, depending on your preferences you have indicated to us.

We may also collect anonymous information regarding the use of the website, such as the pages that are browsed and monitoring website use, which includes the use of cookies (see section below). This helps us to continually improve our website and to enable the best user experience possible.

### How do we use the information we collect?

We may collect and process your PII for any of the following purposes:

To understand your needs and preferences to help us in designing our development schemes;

To obtain views in relation to prospective or existing developments and/or planning permissions;

To conduct market research;

To contact you and/or send out information to you about us, our properties or our development sites, either prospective or existing;

To improve our website;

To personalise user experience on our website;

To respond to gueries and/or complaints;

For internal record keeping.

We may contact you by email, telephone or post, depending on the preferences you have indicated to us. We endeavour to notify you of the purpose for collecting and processing your data at the time it is collected.

We may also collect anonymous information regarding the use of the website, such as the pages that are browsed and monitoring website use, which includes the use of cookies (see section below). This helps us to continually improve our website and to enable the best user experience possible.

### How do we protect the information we collect about you?

The information we collect will be stored securely through appropriate physical, electronic and managerial procedures that we have implemented to protect your information from loss, misuse, unauthorised access or disclosure or alteration.

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, transaction information and data stored on our website.

Save as stated in this Policy, we will not sell, distribute or rent your PII to third parties unless we have your permission or are required by law to do so. We use content marketing specialists Arrowlight and design agency The Armoury to help us operate and administer activities on our social media pages and website. Your PII will be collected by Arrowlight and The Armoury on our behalf, and will not be used by them for any other purpose, nor will it be used by them to contact you.

We may also share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

Please be aware that communications over the internet, such as emails are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered, which is the nature of the internet. Horning Pleasurecraft Ltd cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

### How long do we keep your personal information?

The duration for keeping your PII will depend on the purpose for which it is collected and processed. The following timescales show how long we will keep your PII, before it is destroyed by permanent deletion if held electronically, or by shredding if held in hard copy.

If you provide us with your PII through an enquiry to purchase a property on one of our developments, your data will be held for three months after the last remaining property on the relevant development has been sold, or, where your enquiry relates to a specific property, a maximum of three months after the specific property to which your enquiry relates has been sold.

Any PII collected in relation to a prospective or existing planning application shall be held for a period of one year from the grant of planning permission (however achieved) providing this does not exceed a period of three years from the date it was collected.

If you apply for a job with Horning Pleasurecraft ltd and are unsuccessful in securing the advertised position, your PII will be held for a maximum of six months following the employee start date for the advertised position. Your PII will not be retained for consideration in respect of future positions unless you provide written consent for us to do so.

Any PII provided by you for any other purpose will be held for a maximum period of one year from the date it was provided, or from the last date of correspondence from you, whichever is later.

The above is subject to the following data protection rights.

What are your data protection rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing – You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us using the details at the end of this Policy if you wish to make a request.

## How do you restrict the collection or use of your personal information?

If you have consented to receiving information from us, you can contact us at any time to have your details updated, removed from our list or to change your preferences as to what information you would like to receive from us and/or how you would like to receive it, by emailing us at hello@broadshols.co.uk

If you would like to obtain details of the personal information we hold about you, please write to Horning Pleasurecraft Ltd, Ferry View Estate, Lower Street Horning, Norfolk. NR12 8PT or email: <a href="hello@broadshols.co.uk">hello@broadshols.co.uk</a>. Please provide your name and address with your request. We would also be grateful if you could include brief details as to the information you would like a copy of, which will assist us in dealing with your request more efficiently.

We may require proof of your identity before we disclose information to you.

Links to third party websites

This policy applies only to websites operated by Horning Pleasurecraft Limited. It does not apply to websites or services of any other companies, individuals, organisations who may advertise or provide content on our website. We do not control the content or links that appear on these websites and are not responsible for the practices employed by websites linked to or from our website. In addition, these websites or services, including their content and links, may be constantly changing. These websites and services may have their own privacy policies and customer services policies and as such we recommend that you check such policies of each website you visit.

#### How do we use cookies?

A cookie is a small file that asks permission to be placed on the hard drive of your computer. It associates a unique ID with your visit to a website in order to improve your experience of using the website.

Our websites may use cookies to enhance your experience. Your web browser places cookies on your hard drive for record-keeping purposes and sometimes to track information about you. Once you close your browser, the cookie is deleted automatically. A cookie does not give us access to your computer or any personally identifiable information about you, other than the data you choose to share with us.

We use cookies to identify which pages are being used. This helps us to analyse data about web traffic and improve our website for visitors.

We use Google Analytics, which is a service provided by Google Inc. Google Analytics uses cookies to allow us to analyse how our website is used. It counts the number of visitors to our website and tells us about how they use the site, such as, how long they stay on the website or which pages are viewed. This information produced by the cookie about your use of the website, which includes your IP address, will be sent to and stored by Google on their servers in the United States. This information will be used by Google to analyse your use of the website, from which they compile reports as well as provide additional services in relation to website activity.

It is possible that Google may transfer this information to third parties if they are required to do so by law, or if they use third parties to process information on their behalf. Google will not link your IP address to any other data that they hold.

You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. Further guidance on this can be found at www.aboutcookies.org. Please note that some parts of our website may not function properly if you choose to delete cookies.

## Changes to this privacy policy

Horning Pleasurecraft Ltd has the discretion to update this privacy policy at any time. When we do, the 'Last Updated' date at the bottom of the policy will be updated accordingly and any changes will be effective immediately.

We will not use personal data in a manner different from that stated at the time it was collected unless we have your consent to do so. You will be given the choice as to whether or not we will be able to use your personal data in a different way.

You are encouraged to frequently check this page for any changes

# How do you contact us?

If you have any comments or complaints about how we are using your personal data, or in relation to thai policy, please contact our Data Protection officer, Victoria Richardson using the details below:

Name: Victoria Richardson

Address: Horning Pleasurecraft, Ferry View Estate, Lower Street, Horning, Norfolk. NR12 8PT

Phone Number: 01692 630614 E-mail: victoria<u>abroadshols.co.uk</u>

How do you complain?

If you are unhappy with how we have used your data, you can also complain to the Information Commissioner's Office.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK<sub>9</sub> 5AF

Helpline number: 0303 123 1113

www.ico.org.uk

Last updated: 1st March 2023