



## PRIVACY NOTICE

### Introduction

Welcome to the AHPO Ltd Privacy Notice.

This notice explains how Wake District (“we”, “us”, “our”) collects, uses and protects your personal data when you:

- visit our website
- make a booking or enquiry
- sign up to receive newsletters, offers or event information
- purchase products or services in connection with your stay

This Privacy Notice should be read together with our Website Privacy Policy and Cookie Policy, which provide further detail on how we process personal data.

### 1. Important Information and Who We Are

#### Controller

AHPO Ltd is the data controller and is responsible for your personal data.

#### Our details

- Legal entity name: AHPO Ltd
- Registered address: Old Joiners Shop, Bowland Bridge, Cumbria, LA8 8JQ
- Key contact: Andrew Hynes
- Email address: [andrew@hynesillingworth.com](mailto:andrew@hynesillingworth.com)
- Telephone: 07826551503

### 2. The Personal Data We Collect

We may collect, use, store and transfer the following categories of personal data:

- Identity Data – first name, surname, title, date of birth, occupation and gender.
- Contact Data – billing address, home address, email address and telephone number.
- Financial Data – bank account and payment card details.
- Transaction Data – details of payments to and from you and details of bookings or purchases.
- Technical Data – IP address, login data, browser type and version, time zone setting, location, browser plug-ins, operating system and platform.
- Profile Data – booking history, stay experience, feedback and survey responses.
- Usage Data – information about how you use our website and services.
- Marketing and Communications Data – we only market to you if you have consented and provided us with an email address.

#### Aggregated and Anonymised Data

We may also collect and use aggregated or anonymised data (such as statistical or demographic data).

This data does not identify you and is not treated as personal data under data protection law. Where anonymised data is combined with personal data, it will be treated as personal data in accordance with this notice.

## Special Category Data

We do not collect special categories of personal data (such as health data, racial or ethnic origin, religious beliefs, biometric data) nor data relating to criminal convictions or offences.

## 3. How We Collect Your Personal Data

We collect personal data through the following methods:

- Direct interactions – when you complete forms, make bookings, cancel bookings, request marketing, or contact us by phone, email or post.
- Third-party interactions – where the lead guest in your party provides your contact details for emergency purposes.
- Third-party providers – including payment processors, IT service providers and booking systems.

A full list of data processors can be seen on request, along with their data processing agreements.

## 4. How We Use Your Personal Data

We will only use your personal data where the law allows us to do so, most commonly where:

- we need to perform a contract with you;
- we need to comply with a legal obligation;
- it is necessary for our legitimate business interests; or
- you have given your consent.

### Purposes for Processing

Purpose

Type of Data

Lawful Basis

Register you as a customer and process bookings

Identity, Contact

Performance of a contract

Process payments and manage bookings

Identity, Contact, Financial, Transaction

Performance of a contract; Legitimate interests

Handle cancellations and refunds

Identity, Contact, Financial, Transaction

Performance of a contract

Manage customer relationships and communications

Identity, Contact, Profile, Marketing

Contract; Legal obligation; Legitimate interests

Website security and administration

Identity, Contact, Technical

Legitimate interests; Legal obligation

Analytics and website improvements

Technical, Usage

Legitimate interests

Marketing recommendations

Identity, Contact, Profile, Usage

Legitimate interests (subject to opt-out)

## 5. Marketing and Opting Out

You may opt out of marketing communications at any time by:

- using the unsubscribe link in our emails; or
- contacting us directly.

Opting out of marketing will not affect service-related communications linked to your booking.

## 6. Data Sharing and Security

We have appropriate security measures in place to protect your personal data from unauthorised access, loss or misuse.

We only share your data with employees, contractors and service providers who need it to perform their role and who are subject to confidentiality obligations.

We have procedures in place to deal with data breaches and will notify you and the Information Commissioner's Office (ICO) where legally required.

## 7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting and tax requirements.

- Booking and transaction records are retained for six (6) years after your last interaction for tax and legal purposes.
- In some cases, we may retain data longer where there is a potential dispute or legal claim.
- Where appropriate, we anonymise personal data for research or statistical purposes.

You may request deletion of your data in certain circumstances.

## 8. International Transfers

We do not transfer your personal data outside the United Kingdom.

## 9. Children's Data

Where bookings include children we do not knowingly collect any children's data.

## 10. Your Legal Rights

You have rights under UK GDPR, including the right to:

- access your personal data
- request correction of inaccurate data
- request erasure of your data
- object to processing
- request restriction of processing
- request data portability
- withdraw consent at any time

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

To exercise your rights, please contact our Data Privacy Manager using the details above.

## 11. Response Times and Fees

- Requests will usually be responded to within one month.
- No fee is normally required, although a reasonable fee may be charged for excessive or unfounded requests.
- We may request proof of identity to protect your data.