

John M F Groat & Sons LTD & Hoy Hotel

Data Privacy Policy Modified 30/7/2019

This privacy policy outlines how we will meet the requirements of relevant legislation to protect your personal information, including what we use it for within our business.

By providing us with your information you confirm that you are over 18 years of age.

John M F Groat & Sons (referred to as “we”, “us” or “our” in this privacy notice) is the data controller and as such is responsible for your personal data.

1. Introduction

This notice informs you of our policy regarding all information we hold and record about you. It sets out the conditions under which we may process any personal information that you provide to us. It covers information that could be used to identify you (“personal information”) and information that does not identify you. In the context of the law “process” means to collect, store, transfer, use or otherwise act on information.

We are committed to ensuring that your privacy is protected. You can be assured that information we hold will not be used for any purpose unintended by them, and will not be sold/transferred to a third party.

It is important that the information we hold about you is accurate and up to date. Please let us know if your personal information changes by emailing us.

Our policy complies with UK Law including the requirements of General Data Protection Regulations and Privacy and Electronic Communications Regulations (PECR).

2. Who we are

Legal name: John M F Groat & Sons LTD
Email Address: jmfgroat@btconnect.com
Postal Address: Anchorfast buildings, Longhope, Stromness, KW16 3PG
Telephone number: 01856 701273

3. How we process information about you

The law requires that we process personal information under one of six defined bases and to notify you of the basis for each category. If a basis on which we process your information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then, if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

4. What data we collect

We may collect the following information:

- Identity data - includes first name, maiden name, last name, marital status and gender
- Contact information including phone number and e-mail address
- Address for sending invoicing and delivery of goods / services
- National Insurance Number and other required information for payroll processing
- Financial information for payment of invoices and purchase of goods or services.
(we do not keep long term records of customer card details).
- Transaction data includes details about payments to and from you and other details of products and services you have purchased from us

5. Information we process as a contractual obligation

When you contact us about a service we provide as part of our business, make an account for invoicing goods or services provided by us, or otherwise agree to our terms and conditions; a contract is formed between you and ourselves. This includes any information that may lead to a contract.

In order to comply with our obligations under that contract, we must process the information you give us. Some of this information may be personal.

We may use it in order to:

- Verify your identity for security purposes
- Sell products to you
- Provide you with services

We process this information on the basis there is a contract between you and us, or that you have requested we use the information before we enter into a legal contract.

6. Information we process with your consent

Wherever possible, we aim to obtain your explicit consent to process information obtained through actions where there is no contractual arrangement between us.

For example; when you make a request for information on our business, a product or services, you are providing your consent to us to process information that may be personal information.

Sometimes your consent is given implicitly, such as when you send us an e-mail to which you would expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use the information in a way that it would identify you personally.

We may continue to process your information on this basis until you request us to stop, or we assume that your consent no longer exists.

You may withdraw your consent at any time by instructing us, via e-mail, mail or a phone call.

7. Information we process for the purpose of legitimate interests

Where we process information on the basis that there is a legitimate interest in doing so, for you or us. We do so after having considered;

- Whether the same objective could be achieved through other means
- Whether processing (or not) might cause you harm
- Whether you would expect us to process your data, and consider it reasonable for us to do so

We may process your data on this basis for the purpose of:

- Record keeping for necessary administration of our business
- Protecting and asserting the legal rights of any party
- Replying to messages, phone calls from you to which we believe you would expect a reply
- Managing business risk, whether insuring against or obtaining professional advice
- Protecting your interests where we believe we have a duty to do so

8. Information we process because we have a legal obligation

Sometimes, we must process your information as a requirement of law, in order to comply with a statutory obligation, such as HMRC tax or insurance obligations.

We may be required to give information to legal authorities if they make a request, or if they have a search warrant, court order or other such proper authorisation.

9. Information recorded from communication via phone, letter or e-mail

When you contact us, whatever method you use, we collect the data you have given us in order to reply with the information you require.

In order to increase the efficiency of our business, we keep a record of your request and our reply.

In order to keep track of our communications with you, we keep personally identifiable information associated with your message, such as your name and e-mail address. These are used to help provide you a high quality service.

10. Complaints received about our business

If we receive a complaint from you, we record all the information you have given us.

We use that information to resolve your complaint.

In the condition of another party being contacted to help resolve your complaint, we may decide to give that party some of the relevant information contained in your complaint. We try to do this as infrequently as possible, but it is a matter of our sole discretion as to whether we do give information, and what that information is.

We may also use the information to help improve our level of service, but not in a way that could be used to identify you or another person.

11. Complaints regarding content on our website

If you should have a complaint about any of the content on our website, we will investigate the problem and correct the content if we feel it is justified, or a requirement by law to do so.

Use of information we collect when you visit our hotel website

12. Cookies and Local Storage

We do not use cookies on our website.

13. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess web page popularity and server performance.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Disclosure and sharing of your information

We do not sell, distribute your personal information to third parties unless we have your permission or are required by law to do so.

14. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

15. Data may be processed outside the European Union

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is bound to data protection requirements within their own country; for example the US/EU Privacy Shield, the Canadian Privacy Act, the Australian Privacy Act etc.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union, specifically that in the country of the United Kingdom
- we comply with a code of conduct approved by a supervisory authority in the European Union, specifically that in the country of the United Kingdom

Access to your own information

16. Your Rights

You have the right to request for us not to process your personal information for marketing purposes.

If you do not wish to receive further communication from us please contact us.

17. Access to your personal information

To obtain a copy of any information we hold on you please send a request to jmfgroat@btconnect.com.

After receiving the request, we will confirm we have received it and will provide you with the information within the 28 day period required.

18. Removal of your information

If you wish us to promptly remove personally identifiable information we hold about you from our records, you may contact us at jmfgroat@btconnect.com.

This may limit the service we can provide to you.

19. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other Matters

20. Links on our website

When you click on links on our website, they may direct you away from our site.

We are not responsible for the privacy practices of other websites and encourage you to read their privacy statements.

21. Use of website by children

Our hotel website is solely used for advertising and making requests for accommodation.

So we do not provide services to under 18 year olds.

If you are under 18, you may use our website only with guardian or parental consent.

22. How you can complain

If you are not happy with any part of our privacy policy, or if you have any complaint then please feel free to contact us.

If your dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are dissatisfied about how we process your personal information, you have the right to lodge a complaint with the Information Commissioner's Office.

The information to do so is at <http://ico.org.uk/concerns/>

23. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information for as long as reasonably required by us:

- to provide you with the services you have requested
- to comply with other law, including the period demanded by our tax authorities
- to support a claim or defence in court

24. Compliance with the law

Our privacy policy has been compiled so as to comply with UK law.

If you think it fails to satisfy with UK law, we should like to hear from you.

It is your choice to use our services / business.

25. Review of this privacy policy

From time to time, we will update this privacy notice as necessary.

The terms that apply to you are those outlined on this notice when you use our business / services.

If you have any questions regarding our privacy policy, please contact us.

26. Further information on the General Data Protection Regulations

For up to date information on your rights under the General Data Protection Regulations.

Please check the website of the Information Commissioner : ico.org.uk