



PRIVACY POLICY

POLICY STATEMENT

- This privacy policy applies to the User of this Website (hereafter referred to as **the User or you**), and Morwenna Surf Chalet Holidays, the owner and provider of this Website.
- Morwenna Surf Chalet Holidays takes the privacy of all information very seriously.
- This privacy policy applies to Morwenna Surf Chalet Holidays use of any and all Data collected by the Company and/or provided by the User in relation to their use of the Website, including Data pertaining to the participation in any/all courses and training offered by the Company.
- This privacy policy should be read alongside, and in addition to, Morwenna Surf Chalet Holidays Terms and Conditions, which can be found at:

https://www.surfchaletolidays.co.uk/files/ugd/a4dfb4_746898315eed4dd3a03896f7e65bb722.pdf

Please read this privacy policy carefully.

DEFINITIONS AND INTERPRETATION

1. In this privacy policy, the following definitions are used:

Data	Collectively all information the User submits to Morwenna Surf Chalet Holidays via the Website. This definition incorporates, where applicable, the definitions provided in Data Protection Laws
Cookies	A small text file placed on the User's computer by this Website when the User visits certain parts of the Website and/or when the User uses certain features of the Website. Details of the cookies used by this Website are set out in the clause below entitled Cookies
GDPR	The UK General Data Protection Regulation

Data Protection Laws	Any applicable law relating to the processing of Personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation
Morwenna Surf Chalet Holidays, we or us	Morwenna Surf Chalet Holidays: Barn Elms, Rose Hill, Porthtowan, Cornwall, TR4 8GJ
UK and EU Cookie Law	The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018
User or you	Any third party that accesses the Website and is not either (i) employed by Morwenna Surf Chalet Holidays and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Morwenna Surf Chalet Holidays and accessing the Website in connection with the provision of such services
Website	The Website, www.surfchaletolidays.com , currently being accessed by the User and any sub-domains of this site unless expressly excluded by their own Terms and Conditions

2.

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa.
- b. references to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy.
- c. a reference to a person includes firms, companies, government entities, trusts, and partnerships.
- d. "including" is understood to mean "including without limitation".
- e. reference to any statutory provision includes any modification or amendment of it.
- f. headings and sub-headings do not form part of this privacy policy.

SCOPE OF THIS PRIVACY POLICY

3. This privacy policy applies only to the actions of Morwenna Surf Chalet Holidays and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For the purposes of the applicable Data Protection Laws, Morwenna Surf Chalet Holidays is the "data controller". This means that Morwenna Surf Chalet Holidays determines the purposes for which, and the manner in which, User Data is processed.

DATA COLLECTED

5. We may collect data, which includes Personal Data, from the User as follows:
 - a. name

- b. contact Information such as email addresses and telephone numbers
- c. demographic information such as postcode, preferences and interests
- d. IP address (automatically collected)
- e. web browser type and version (automatically collected)
- f. a list of URLs starting with a referring site, User activity on this Website, and the site to which the User exits (automatically collected)

In each case, in accordance with this privacy policy.

HOW WE COLLECT DATA

6. **Morwenna Surf Chalet Holidays** collects Data in the following ways:

- a. data is given to us by the User
- b. data is received from other sources
- c. data is collected automatically.

DATA THAT IS GIVEN TO US BY YOU

7. **Morwenna Surf Chalet Holidays** will collect your Data in a number of ways, for example:

- a. When you contact us through the Website, by telephone, post, e-mail or through any other means;
- b. When you register with us and set up an account to receive our products/services;
- c. When you enter a competition or promotion through a social media channel;
- d. When you make payments to us, through this Website or otherwise;
- e. When you elect to receive marketing communications from us;
- f. When you use our services.

In each case, in accordance with this privacy policy.

DATA THAT IS RECEIVED FROM PUBLICLY AVAILABLE THIRD-PARTY SOURCES

8. We will receive Data about the User from the following publicly available third-party sources:

- a. Facebook
- b. Instagram
- c. Trip Advisor
- d. Airbnb
- e. Riviere Towans Direct

DATA THAT IS COLLECTED AUTOMATICALLY

9. To the extent that the User accesses the Website, we will collect their Data automatically, for example:

- a. We automatically collect some information about Users' visits to the Website. This information helps us to make improvements to Website content and navigation, and includes the User's IP address, the date, times and frequency of access to the Website and the way the User uses and interacts with its content.
- b. We will collect User Data automatically via cookies, in line with the cookie settings on the User's browser. For more information about cookies, and how we use them on the Website, please see the section below, headed "Cookies".

OUR USE OF DATA

10. Any or all of the above Data may be required by us from time to time in order to provide the User with the best possible service and experience when using our website. Specifically, Data may be used by us for the following reasons:
 - a. internal record keeping
 - b. improvement of our products/services
 - c. transmission by email of marketing materials that may be of interest to the User

In each case, in accordance with this privacy policy.

11. We may use User Data for the above purposes if we deem it necessary to do so for our legitimate interests. If Users are not satisfied with this, they have the right to object in certain circumstances (see the section headed "Your Rights" below).
12. For the delivery of direct marketing to the User via e-mail, we will need User consent, whether via an opt-in or soft-opt-in:
 - a. Soft opt-in consent is a specific type of consent which applies when the User has engaged with us previously (for example, we have been contacted for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take User consent as given unless the User opts out:
 - b. For other types of e-marketing, we are required to obtain the explicit consent of the User, that is, the User needs to take positive and affirmative action when consenting by, for example, checking a tick box that we will provide.
 - c. If a User is not satisfied with our approach to marketing, they have the right to withdraw consent at any time. To find out how to withdraw consent, please see the section headed "Your Rights" below.
13. When a User registers with Morwenna Surf Chalet Holidays and sets up an account to receive our services, the legal basis for this processing is the performance of a contract between the User and us and/or taking steps, at the User's request, to enter into such a contract.
14. User Data may be used to show the respective client Morwenna Surf Chalet Holidays adverts and other content on other websites. If the User does not want us to use their data to show Morwenna Surf Chalet Holidays adverts and other content on other websites, they are requested to turn off the relevant cookies. (Please refer to the section headed "Cookies" below).
- 15.
16. Behavioural Advertising: As described above, we use Personal Information to provide the User with targeted advertisements or marketing communications we believe may be of interest to the User. For more information about how targeted advertising works, please visit the Network Advertising

Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

17. To

18. opt out of targeted advertising, please use the links below:

19.

Facebook: <https://www.facebook.com/settings/?tab=ads>

Google: <https://www.google.com/settings/ads/anonymous>

Bing: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

20. Additionally, the User can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

WHO WE SHARE DATA WITH

21. **Morwenna Surf Chalet Holidays** may share User Data with the following groups of people for the following reasons:

- a. our employees, agents and/or professional advisors - to obtain advice from professional advisers
- b. third party service providers who provide services to us which require the processing of personal data - to help third party service providers in receipt of any shared data to perform functions on our behalf to help ensure the website runs smoothly
- c. third party payment providers who process payments made over the Website - to enable third party payment providers to process user payments and refunds

In each case, in accordance with this privacy policy.

KEEPING DATA SECURE

22. **Morwenna Surf Chalet Holidays** will use technical and organisational measures to safeguard User Data, for example:

- a. Access to User accounts is controlled by a Password and a Username that is unique to the User.
- b. Data is stored on secure servers.

23. Technical and organisational measures include measures to deal with any suspected data breach. If a User suspects any misuse, loss or unauthorised access to their Data, please let us know immediately by contacting us via this e-mail address: info@surfchaletolidays.com

24. For detailed information on how to protect personal information, computer(s) & device(s) against fraud, identity theft, viruses and many other online problems, please visit Get Safe Online at www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

DATA RETENTION

25. Unless a longer retention period is required or permitted by law, Morwenna Surf Chalet Holidays will only hold User Data on its systems for the period necessary to fulfil the purposes outlined in this privacy policy or until the User requests that the Data be deleted.

26. Please note that even if User Data is deleted, it may persist on backup or archival media for legal, tax or regulatory purposes.

YOUR RIGHTS

27. **You, the User**, have the following rights in relation to your Data:

- a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will provide you with the reasons for this decision.
- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
- c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
- d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
- e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
- f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

28. To make enquiries, exercise any of the User rights set out above, or withdraw consent to the processing of personal Data (where consent is our legal basis for processing your Data), please contact us via the following e-mail address: info@surfchaletolidays.com

29. If a User is not satisfied with the way a complaint they make in relation to how their Data is handled by us, they may be able to refer their complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

30. It is important that the User Data we hold is accurate and current. Please keep us informed of any changes to Personal Data made during the period for which it is being held.

LINKS TO OTHER WEBSITES

31. This Website may, from time to time, provide links to other websites. Morwenna Surf Chalet Holidays has no control over such websites and is not responsible for the content of these websites. This privacy policy does not extend to the User's use of such websites. The User is advised to read the privacy policy or statement of other websites prior to using them.

CHANGES OF BUSINESS OWNERSHIP AND CONTROL

32. Morwenna Surf Chalet Holidays may, from time to time, expand or reduce its business and this may involve the sale and/or the transfer of control of all or part of Morwenna Surf Chalet Holidays. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

33. Morwenna Surf Chalet Holidays may also disclose Data to a prospective purchaser of its business or any part thereof.

34. In the above instances, Morwenna Surf Chalet Holidays will take steps to ensure that User privacy is protected.

COOKIES

35. This Website may place and access certain Cookies on a User's computer. Morwenna Surf Chalet Holidays uses Cookies to improve User experience of the Website and to improve our range of services. Morwenna Surf Chalet Holidays has chosen these Cookies carefully and has taken steps to ensure that User privacy is protected and respected at all times.
36. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
37. Before the Website places Cookies on a User's computer, a message bar requesting User consent to set those Cookies shall appear. By giving consent to the placing of Cookies, the User is enabling Morwenna Surf Chalet Holidays to provide a better experience and service. The User may, if they so wish, deny consent to the placing of Cookies however, certain features of the Website may not function fully or as intended.
38. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly Necessary Cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable the User to log into secure areas of our website, use the shopping cart or make use of e-billing services.
Analytical/Performance Cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that Users can easily find what they are looking for.
Functionality Cookies	These are used to recognise a User when they return to our website. This enables us to personalise our content for them, greet them by name and remember their preferences (for example, choice of language or region).
Targeting Cookies	These cookies record the User's visit to our website, the pages they have visited and the links they have followed. We will use this information to make our website and the advertising displayed on it more relevant to their interests. We may also share this information with third parties for this purpose.

- 39.
36. Please find a list of Cookies that we use in the Cookies Schedule.
37. A User can choose to enable or disable Cookies in their internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.
38. Users can choose to delete Cookies at any time however, information enabling quicker and more efficient Website access may be lost including, but not limited to, personalisation settings.
39. It is recommended that Users ensure that their internet browser is up-to-date and that they consult the guidance and help provided by the developer of their internet browser if unsure about adjusting privacy settings.
40. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. Details on how to delete cookies from a computer can also be found.

GENERAL

41. **Users** may not transfer any of their rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe rights of the User will not be affected.
42. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
43. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
44. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

CHANGES TO THIS PRIVACY POLICY

45. Morwenna Surf Chalet Holidays reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and the User is deemed to have accepted the terms of the privacy policy on their first use of the Website following the alterations. Users may contact Morwenna Surf Chalet Holidays by email at info@surfchaletolidays.com

Attribution

46. This privacy policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (<https://www.rocketlawyer.com/gb/en>).

DOCUMENT CREATION & REVIEW INFORMATION

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Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary

We use the following strictly necessary cookies:

Description of Cookie	Purpose
XSRF-TOKEN	Used for security reasons
hs	Used for security reasons
svSession	Used in connection with user login
SSR-caching	Used to indicate the system from which the site was rendered
_wixCIDX	Used for system monitoring/debugging
_wix_browser_sess	Used for system monitoring/debugging
consent-policy	Used for cookie banner parameters
smSession	Used to identify logged in site members
TS*	Used for security and anti-fraud reasons
bSession	Used for system effectiveness measurement
fedops.logger.sessionId	Used for stability/effectiveness measurement

Analytical/performance

We use the following analytical/performance cookies:

Description of Cookie	Purpose
Facebook Pixel	We use this cookie to help us analyse how users use the website.

Functionality

We use the following functionality cookies:

Description of Cookie	Purpose
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Facebook Pixel	We use this cookie to identify your computer and analyse traffic patterns on our website
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Targeting

We use the following targeting cookies:

Description of Cookie	Purpose
Facebook Pixel	We use this cookie to enable us to show you adverts while you are browsing our website and other websites on the internet