

## **Holker Group Privacy Policy**

Holker Group takes your privacy and security seriously and we are committed to protecting your personal information.

This privacy policy explains what information we obtain from you and how we store and use it. The policy applies if you are a tenant, customer, supplier, employee or use any of our services, visit our website, use our mobile app, email, call or write to us.

We will never sell your personal information and will only share it with organisations we work with when it is necessary.

Topics covered by this policy:-

- Who are “we”?
- What personal information do we collect?
- How we use your personal information
- Sensitive personal information relating to employment
- Accessing and accuracy to your personal information
- How secure is your information?
- Providing your personal information to third parties
- Retention of your personal information
- Your information protection rights
- Complaints about how we handle your personal information
- Updating your marketing preferences
- Cookies and third party websites
- Payment card security
- CCTV
- Changes to our privacy policy
- Contact us

### **Who are ‘we’?**

In this policy, whenever you see the words ‘we’, ‘us’, ‘our’, we mean Holker Group.

The Holker Group is a family owned group of businesses rooted in South Cumbria on the edge of the English Lake District, the Holker Group combines the very best of British industry and enterprise, with time honored values of integrity, quality and tradition.

The Holker Group is the collective name for the following legal entities:-

Holker Holdings Limited  
Holker Estates Co. Limited  
Cartmel Steeplechase (Holker) Limited  
Vitagrass Farms (Holker) Limited  
Holbeck Homes Limited  
Burlington Slate Limited  
Holker Estates Trust

If you have any questions in relation to this privacy policy or how we use your personal information, they should be sent to [estateoffice@holkergroup.co.uk](mailto:estateoffice@holkergroup.co.uk) or addressed to the Data Protection Officer, Holker Group, Cavendish House, Kirkby-in-Furness, Cumbria. LA17 7UN

## **What personal information do we collect?**

Your personal information is any information which identifies you, or which can be identified as relating to you personally.

We collect information when you fill in forms on our website, when you register to receive newsletters, use our websites, participate in discussion boards, enter competitions or promotions.

Personal information is also collected when you contact or communicate with us directly via email, telephone, in writing, social media or during specific activities such as placing an order for goods and services, applying for or renewing annual membership, during employment, applying to become a supplier or customer.

We may also collect personal data from you when you purchase tickets from us at an event such as a Race Day or Spring Fair.

We may also collect your name and email address if you register to use the wi-fi network at our various venues.

## **How we use your personal information**

We will only use your personal information on relevant lawful grounds as permitted. When you interact with us, through our website, social media, in person or electronically, we may collect the following personal information about you for the purposes noted below.

- To fulfil our obligations under Annual Membership - Personal details collected by us include, but not limited to, name, address, date of birth, email, telephone and mobile numbers.
- To provide services to you/ receive services from you under our contract Terms and Conditions. Information stored includes, but not limited to:-
  - Suppliers (name, address, email, specified person(s)' contact details, telephone and mobile numbers, payment information such as bank accounts details).
  - Customers (name, address(s), email, specified person(s)' contact details, telephone and mobile numbers).
  - We may share and obtain further information about you by using Credit Reference agencies to obtain your credit score and credit report as part of our contract review.
- Personal purchases such as event tickets - Personal details collected and stored by us include, but not limited to, name, address, date of birth, email, telephone and mobile numbers. We will use this information to send you the purchase and in certain circumstances verify your identity.
- To provide support during visits to our venues - We may collect details of any disabilities or other health issues that you have if you need us to administer them during your visit to our venues, including our Racecourse and Hall and Gardens.
- To provide responses to enquiries - We may use the information you provide to us to respond to your enquiries or to process your requests.
- We may (in circumstances where we do not have another legal basis on which to do so) ask you to consent to us processing your information – e.g. when sending you marketing materials from time to time or to process your health data in order to

administer your visit to our venues. If we do so, we will provide you with details of the information that we would like and the reason(s) we need it, so that you can consider whether you wish to consent. As we will explain at the time we collect any such consent, you have the right to withdraw the consent you have provided at any time.

- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as selling you tickets), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of visitors to our events). If you withdraw your consent to us processing your personal information (where consent has been provided), that might also have an impact on our ability to permit you to visit our venues.
- Website activity - Tracking your activity on our website and social media platforms, tracing purchasing activity including the types of products purchased and frequency. Tracking terms that you use to search our website.
- Other – We may process personal information under the principle of legitimate interests as defined under GDPR. By maintaining data on you we are able to keep you informed of market information and generally promote our services. We have undertaken the relevant assessments to ensure all personal data meets the legitimate interests criteria.

There are some communications that we need to send to fulfil our obligations to you as an annual member, purchaser of racing tickets or as a business customer or supplier of Holker Group. Examples are:-

- Transaction messaging, such as ticket purchase confirmations.
- Remittance advices.
- Annual membership and Caravan Park customer related mailings such as renewal reminders.

We use the information collected to:-

- Fulfil our contractual obligation to provide and receive products and services from you.
- Personalise and tailor marketing material.
- Inform you about events and promotions that we feel you may be interested in.
- Improve your experience on our websites.
- Measure the effectiveness and delivery of advertising to you.

Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

Employees:-

We collect personal information about our employees and candidates applying for specific employment roles for the following purposes to:-

- Evaluate your suitability for employment.
- Fulfil our obligations under your employment contract.
- Fulfil our legal obligations to HMRC and other third parties arising from the contract.
- Process your application for an employment role advertised by us.

The information we record includes, but not limited to, the following information:-

- Name and Address
- Date of birth
- Gender
- Education and qualifications, work experience
- National insurance number

- Tax code
- Telephone and mobile numbers
- Personal email address
- Bank details
- Next of kin and details of any known disability and emergency contact details.
- General personnel information including but not limited to employment contract, appraisal forms, employment history, any accidents at work, any training taken and any disciplinary action.

### **Sensitive personal information relating to employment**

‘Sensitive personal information’ is information about racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, criminal allegations, proceedings or convictions.

In certain limited circumstances, we may legally collect and process sensitive personal information without requiring the explicit consent of an employee.

We will process information about an employee’s health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee’s knowledge and consent, where necessary.

We will process information about, but not limited to, an employee’s racial and ethnic origin or religious beliefs only where they have volunteered such information and only for the purpose of monitoring and upholding our equal opportunities policies and related provisions.

Information about an employee’s criminal convictions will be held, as necessary.

### **Accessing and accuracy of your personal information**

You have the right to request a copy of the personal information that we hold about you. If you would like a copy of some or all of your personal information, please write to use at the address shown in Contact Us.

We will make sure that your information is accurate and as up to date as possible. We will not be responsible for updating that information if it changes. You can ask us to correct or remove inaccurate information we hold on you. Contact us using one of the methods noted below.

### **How we secure your personal information?**

We take the security of your personal information seriously. Information systems and information security is very important to us to ensure that we are keeping our customers, supplier, members, employees information safe.

We have procedures in place to protect our information systems from accidental loss and misuse and only allow access to them under controlled conditions when it is necessary to do so. We have strict guidelines in place to determine how personal information can be used within our organisations and we aim to limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

## **Providing your personal information to third parties**

In order to carry out our statutory responsibilities, imposed by law, we may need to share personal information with one or more third parties, for example HMRC and pension providers. As an employer the information that may be passed to third party organisations includes, but is not limited to tax, NIC, SSP, SMP, pension, equal opportunities monitoring.

We may also share your information with third parties:-

- If we are under a legal or regulatory obligation to do so.
- If it is necessary to do so to enforce our contractual rights.
- To lawfully assist the police or security services with the prevention and detection of a crime, terrorist activity or fraud.
- Where such disclosure is necessary to protect the right, property, safety or security of any person.
- Where otherwise permitted under applicable law.

Where we use cloud based software the third-party service provider(s) are required to take appropriate security measures to protect your personal information in line with GDPR requirements. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When we allow third parties acting on behalf of the Holker Group to access to your information, we will ensure that we have complete control of what they can access and how long they can access it for and what they are allowed to do with it.

We do not sell or share your personal information to other organisations outside Holker Group to use.

Personal information collected and processed by us may be shared with the following organisations, where necessary:-

- Holker Group organisations.
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website.
- Third party cloud hosting IT partners.
- Contractors.
- Advisors.

## **Retention of your personal information**

We will keep your personal information for as long as it is reasonably necessary for us to do so in accordance with applicable laws. Information which we required consent to collect and process will be retained until you withdraw consent. How long it will be kept for depends on the information in question, what it is being used for and to satisfy applicable statutory legal requirements.

Holker Group operations are based in the UK and we store most of our information within the European Economic Area (EEA).

We may transfer personal information about you outside of the European Economic Area (EEA). For example some of your information may be transferred to our US subsidiary Burlington Stone Inc in order to meet our contractual obligations. To ensure that your

personal information receives an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by these parties in a way that is consistent with and which respects the EU and UK laws on data protection.

### **Your information protection rights**

Where Holker Group is using your personal information based on consent, you have the right to withdraw that consent at any time, (your 'right to be forgotten').

You can request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You can request us to erase your personal information where we have no compelling reason for its continued processing.

You also have the right to ask the Holker Group to stop using your personal information for direct marketing purposes.

You can object to us processing your personal information where we are relying on a legitimate interest (or those of a third party).

You can request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

You can request the transfer of your personal information to another party.

If you would like further information on your rights or wish to exercise them, please write to us using the information in Contact Us.

You will be asked to provide the following details:-

- The personal information you want to access.
- Where it is likely to be held.
- The date range of the information you wish to access.

We will also need you to provide information that will help us confirm your identity.

We aim to provide the information requested within 30 days of receipt of your request.

### **Complaints about how we handle your personal information**

Please speak to us so we can resolve any problems or queries you have with the way we are dealing with your personal information. Please contact us at [estateoffice@holkergroup.co.uk](mailto:estateoffice@holkergroup.co.uk)

If you are unsatisfied by our response to any of your data protection issues you also have the right to contact The Information Commissioner's Office (ICO) to make a complaint. You can contact them using their helpline 0303 123 113 or at [www.ico.org.uk](http://www.ico.org.uk).

The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.

### **Updating your marketing and contacting preferences**

Your privacy is important to us, so we will always keep your details secure. We would like to use your details to keep in touch about things that may be of interest to you.

If you choose to hear from us, we may send you information based on what is most relevant to you or things you have told us you like. This might be about visiting our properties, annual membership, events, offers, racing, Caravan Parks and shops.

We will only send these to you if you agree to receive them and we will never share your information with companies outside the Holker Group for inclusion in their marketing. We may however share cookie information with third parties to help with our own advertising targeting. If you agree to receive marketing information from us, you can change your mind later.

We want you to remain in control of your personal information. If, at any time, you want to update or amend your marketing preferences please write to us using the information in Contact Us.

We will always act upon your choice of how you want to receive communications (for example, by email, post or phone).

### **Cookies and links to third party websites**

#### **Cookies**

Cookies are small text files placed on your computer to collect standard internet log information and visitor behaviour when you visit a website. Cookies allow a website to recognise a particular device or browser during a visit and on subsequent visits. This information is used to track visitor use of the website and to compile statistical reports on website activity.

You can control the use of cookies via your browser. However, in a few cases some of our website features may not function as a result.

Further information can be found in the website cookie policy on each of the individual website within the Holker Group.

#### **Links to other websites**

Our website may contain links to other websites including but not limited to our joint venture partners and affiliates. This privacy policy applies solely to the personal information collected by the Holker Group. If you follow a link to any of these websites, you should review their own privacy policies before submitting any personal data. We do not accept any responsibility or liability for these policies.

### **Payment card security**

Holker Group has an active PCI-DSS compliance programme in place. This is the international standard for safe card payment processes. As part of our compliance, we aim to ensure that

our IT systems do not directly collect or store payment card information, such as the full 16 digit number on the front of the card or the security code on the back.

Credit card and debit card purchases and our online payment solutions are carried out using a third party 'payment gateway' (e.g. Sagepay). This is a direct connection to a payment service provided by a bank, when you input card information into the payment page or pay personally by card, you are communicating directly with the bank and the bank passes your payment to us. Your payment card information is handled by the bank and not processed or held by us.

## **CCTV**

Some of our venues and properties have Closed Circuit Television (CCTV) and you may be recorded when you visit them.

CCTV is used to provide security and protect our members, customers, visitors and Holker Group. CCTV will be only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for a set period after which it is removed. Holker Group aims to comply with the Information Commissioner's Office CCTV Code of Practice.

## **Changes to our privacy policy**

We keep our privacy policy under regular review. Any updates will be placed on our website [www.holkergroup.co.uk](http://www.holkergroup.co.uk) and other group websites as relevant. Your continued use of our websites will confirm your acceptance of the amended terms.

The policy is effective from 10 May 2018.

## **Contact us**

Email - [estateoffice@holkergroup.co.uk](mailto:estateoffice@holkergroup.co.uk)

015395 58313. Open 9.00am - 5.00pm weekdays

Write to:  
Data Protection Officer  
Holker Group  
Cavendish House  
Kirkby-in-Furness  
Cumbria  
LA17 7UN