**Privacy Notice**

**BACKGROUND:**

 Brampton Grange Estates Ltd understands that your privacy is important to you and that you care about how your personal data is used. Brampton Grange Estates Ltd respect and value the privacy of all clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

1. Information About [Us] OR [Me]

Brampton Grange Estates Ltd

Sole Trader **[**registered in England under company number 03430172.

Registered address:

8thFloor, Thavies Inn House, 3-4 Holborn Circus, London EC1N 2HA, United Kingdom

Main trading address: **OR [**Address:**]**

Brampton Grange Estate Ltd, Sandy Lane, Chapel Brampton, Northants, NN6 8AD UK.

VAT number: 8973920 65

Data Protection Officer: Antonio Fedrigoni.

Email address: antonio.f@bramptongrange.net

Telephone number: 01604 844717.

Postal address: Brampton Grange Estate Ltd, Sandy Lane, Chapel Brampton, Northants, NN6 8AD UK

1. What Does This Notice Cover?

This Privacy Information explains how I use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

1. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that I use is set out in Part 5, below.

1. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **I** will always work to uphold:

* + - 1. The right to be informed about my collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 11.
			2. The right to access the personal data I hold about you. Part 10 will tell you how to do this.
			3. The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 11 to find out more.
			4. The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I hold. Please contact me using the details in Part 11 to find out more.
			5. The right to restrict (i.e. prevent) the processing of your personal data.
			6. The right to object to me using your personal data for a particular purpose or purposes.
			7. The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
			8. The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
			9. Rights relating to automated decision-making and profiling. I do not use your personal data in this way

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep me informed as long as I have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 11.

1. What Personal Data Do You Collect and How?

Depending upon your use of My Site, I may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. I do not collect any ‘special category’ or ‘sensitive’ personal data **AND/OR** personal data relating to children **AND/OR** data relating to criminal convictions and/or offences.

|  |  |
| --- | --- |
| **Data Collected** | **How [We] OR [I] Collect the Data** |
| Identity Information including name, title, date of birth, gender, relationship status, driving licence and passport info. | Direct from client. |
| Contact information including address, phone number, email address, social media details. | Direct from client. |
| Business information including business name, job title, contact details for business as above. | Direct from client. |
| Payment information including card details (debit or credit), bank account details, PO numbers. | Direct from client. |
| Profile information including preferences, interests, purchase history.. | Third party e.g. Facebook, email marketing. |
| Data from third parties including paid data such as emails, third party advertising. | Via third party where relevant and in accordance with their privacy policies. |
|  |  |

1. How Do You Use My Personal Data?

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I will **OR** may use your personal data, and my lawful bases for doing so:

|  |  |  |
| --- | --- | --- |
| **What [We] OR [I] Do** | **What Data [We] OR [I] Use** | **[Our] OR [My] Lawful Basis** |
| Administering my business. | Your personal information that has been voluntarily given by you. | Legitimate interests to plan your event as briefed by you. Booking details, planning etc. |
| Supplying myproducts **AND/OR** services to you. | Contact information. | Legitimate interests to plan your event. The need to contact you via phone, text, email etc re planning. |
| Managing payments for our myservices**.** | Payment details and contact information. | Legitimate interests to plan your event. Payments for services relating to your event. |
| Personalising and tailoring myservices for you. | Contact information, preferences. | Legitimate interests to plan your event.  |
| Communicating with you. | Contact information. | Legitimate interests to plan your event. |
| Supplying you with information by email that you have opted-in-to (you may opt-out at any time by unsubscribing via the email. | Contact details (email address). | Legitimate interests for direct marketing to clients that I am or have worked with. |
|  |  |  |

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on myproducts **AND/OR** services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.Iwill always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Iuse the following automated systems for carrying out certain kinds of decision-making **AND/OR** profiling. If at any point you wish to query any action that Itake on the basis of this or wish to request ‘human intervention’ (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact meto find out more using the details in Part 11.

* **[**The following automated decision-making method(s) may be used:
	+ We do not use automated decision making.
* **[**The following automated profiling may take place:
	+ Advertising via third party platforms, such as social media for advertising.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 11.

I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, I will inform you and explain the legal basis which allows me to do so.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

1. How Long Will You Keep My Personal Data?

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

|  |  |
| --- | --- |
| **Type of Data** | **How Long [We] OR [I] Keep It** |
| Identity Information including name, title, date of birth, gender, relationship status, driving licence and passport info. | One year after your event for follow up purposes. |
| Contact information including address, phone number, email address, social media details. | One year after your event for follow up purposes. |
| Business information including business name, job title, contact details for business as above. | One year after your event for follow up purposes. |
| Payment information including card details (debit or credit), bank account details, PO numbers. | One year after your event for follow up purposes. |
| Profile information including preferences, interests, purchase history.. | One year after your event for follow up purposes. |
|  |  |

1. How and Where Do You Store or Transfer My Personal Data?

I will only store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to me, and to protect your data, I take a number of important measures, including the following:

* limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
* procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where I am legally required to do so;
* Measures in place inline with the ICO data breach rules. The ICO and clients will be made aware of a data breach with available information, no later the 72 hours after we OR I become aware of the breach.
1. Do You Share My Personal Data?

Iwill not share any of your personal data with any third parties for any purposes, subject to the following exception**s**.

If I sell, transfer, or merge parts of my business or assets, your personal data may be transferred to a third party. Any new owner of my business may continue to use your personal data in the same way(s) that I have used it, as specified in this Privacy Policy.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

1. How Can I Access My Personal Data?

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell me everything I need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.

I will respond to your subject access request within **one month from the following working day** Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

1. How Do I Contact You?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details **[**(for the attention of Antonio Fedrigoni

Email address: antonio.f@bramptongrange.net.

Telephone number: 01604844717

Postal Address:

Brampton Grange Estate Ltd

Sandy Lane, Chapel Brampton

Northants NN6 8AD UK.

1. Changes to this Privacy Notice

**[**We**] OR [**I**]** may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be made available on the website. This Privacy Notice was last updated on 1.1.19.