

# Sound Start UK Limited (Trading as Cornish Holiday)

## Data Protection / Privacy Policy

### Purpose

The purpose of this document is to ensure that Sound Start UK Limited (Trading as Cornish Holiday) meet the requirements of the current General Data Protection Regulations (GDPR). This demonstrates how and what Sound Start UK Limited (Cornish Holiday) collects, stores and deletes in terms of data and how long the data is held for. Along with the roles and responsibilities within the organisation and to ensure compliance to current legislation.

Data Protection Officers:- Directors of Sound Start UK Limited

Data Processors:- Directors of Sound Start UK Limited, Sales & Marketing function, 3<sup>rd</sup> party booking platforms.

### Consent for processing and holding Data:-

By working with, booking a holiday with and entering data for use by Sound Start UK Limited (Trading as Cornish Holiday) or through a platform managed by a third party or other organisation **you are giving consent** for this data to be held and used as explained within this document. If you do not give consent or do not want the information retained, please **DO NOT** enter it.

### Data Held:-

The data collected by Sound Start UK Limited is used in two forms Business to Business and also individual's personal data.

#### Business to Business:

The data held for this purpose does NOT contain any personal data and only general data to enable businesses and organisations to work and trade together is shared. No personal data is shared with any other organisations or third parties unless agreed in writing. The data held is:-

- Name of individual / individuals to contact at the business / organisation.
- Role of individual within the business (e.g. Owner, buyer, marketing / admin etc).
- Email contact details.
- Name and address of business / organisation.
- Telephone number, fax number and email address of business / organisation.

- Web address of business / organisation.
- Notes and general information about the organisation. What they think of Sound Start UK Limited (Cornish Holiday), our performance along with information and notes to help the marketing role and fulfil any orders / agreements which may have been won or entered into.

#### Individual and Personal Data:

The data held for this purpose only contains a limited amount of information to enable Sound Start UK Limited (Cornish Holiday) to receive payment and be able to communicate such information as to ensure the holiday and experience is as good as it possibly can be. Information may also be used to aid with marketing, keeping previous and potential guests up to date with information and any developments taking place or coming up which it is felt may be of interest.

No personal data is shared with any other organisations or third parties unless agreed in writing. If an external platform is used to book a stay or make payment then it is the responsibility of the individual entering the data along with the organisation receiving the data to ensure it is safe and complies with current legislation. Sound Start UK Limited (Cornish Holiday) will do everything possible to ensure the organisations and platforms which allow their properties to be booked meet current legislation but unfortunately cannot take responsibility or have liability for another organisation or anything out of their control. The data held is:-

- Name of individual / individuals to contact.
- Email Contact details.
- Home address contacts including phone number.
- Booking information.

#### Control, changes to policy and implementation.

The Data Protection / Privacy Policy, will be reviewed at least annually to ensure it is reviewed, maintained and communicated as required.

- Data will be held indefinitely or until it is considered not to be relevant or when an individual or business requests that their information is removed. At this time it will be deleted from our records.
- Requests for the information held will be communicated as soon as is possible following confirmation this is going to the correct individual / organisation.

#### Communicating control of information and privacy policy.

Our Data Protection / Privacy Policy will be available to view on our website, the footer of our emails will also contain a link. Our welcome pack will also contain a statement saying:

**To view and understand our Data Protection and Privacy Policy please visit our website [www.cornishholiday.info](http://www.cornishholiday.info)** to inform individuals that the data they have supplied will be retained.

### Requests for Data:-

Requests for data will be actioned on an individual, request by request basis. Once it has been verified that the request is genuine and from the correct person / organisation / authority, the information will be provided as soon as possible.

### Lawful basis for holding / processing data:-

Sound Start UK Limited (Trading as Cornish Holiday) basis for holding and processing data shall be lawful as:-

- The data subject has given consent to the processing of his / her personal or company / organisation data for one or more specific purposes.
- Processing is necessary for the fulfilment of meeting customers and potential customer requests in terms of quoting, contracts and orders, communicating information about dates and times, pricing and quality along with ensuring up to date information about Sound Start UK Limited (Trading as Cornish Holiday) and its activities are communicated accurately and concisely.

### No information is held on Children (persons under the age of 18)

### Data Breaches:-

If there is a data breach, then the relevant authorities will be notified along with all relevant personnel / organisations as soon as Sound Start UK Limited (Trading as Cornish Holiday) become aware of such breach.

### Protection Impact Assessments (PIA):-

Sound Start UK Limited (Trading as Cornish Holiday) will assess if a Personal Impact Assessment (PIA) is required during their Risk Assessment and if felt appropriate will carry out the necessary assessment and actions following the guidelines and good practice of the Information Commissions Office (ICO)