

Retreat to Gayles Privacy Policy

We value our visitors and so our booking form asks you for particular information to help us to make your stay here as personal and comfortable as we can and to that end we will hold the following information about you:

- Your name, address, email address and contact numbers;
- Your gender and date of birth; and
- Any dietary requirements or health issues.

This is information that you provide on the booking form when you book to come and stay with us.

Our legal bases for holding and using your information

Set out below are the legal bases (reasons) that we rely on for handling your personal information.

Necessary for contract (“C”)

Sometimes we will need to use your information to comply with our contractual obligations and to ensure that you can comply with your contractual obligations. Examples of these include:

- We will need your name, address and contact number so that we can organise your retreat; and
- We will need your dietary requirements and any health issues so that we can tailor your retreat to your needs and provide you with a safe and enjoyable experience.

Legitimate interests (“LI”)

We will use your information where it is necessary for our legitimate interests. However, if your interests and fundamental rights override our legitimate interests then we will not rely on this basis for using your information.

Gayles has a legitimate interest in:

- Providing a retreat environment for you to enjoy;
- Looking after your welfare while you are at Gayles;
- Promoting Gayles Retreat so that others can discover and enjoy;
- Using your information in connection with legal disputes. For example, if there is a claim brought against us;
- Facilitating the efficient operation of Gayles; and
- Ensuring that we comply with all relevant legal obligations.

In addition, your personal information may be processed for the legitimate interests of others.

Legal obligation (“LO”)

Sometimes we will need to comply with various laws. This entitles us to use your information to fulfill this obligation

An example of this is that we have a duty of care to you and will need to use your personal information to fulfill this duty of care during your stay with us.

Vital interests (“VI”)

We are permitted to use your information where it is necessary to protect your vital interests or someone else’s. For example, to prevent you or them from being seriously harmed or killed.

Where we process special categories of personal data, including information revealing ethnic origin, religious beliefs or health information, we must also comply with an additional condition. The bases that we are relying on to process special categories of personal information are set out below:

Social security and social protection (“SP”)

When we rely on this the processing must be necessary for the purposes of carrying out our obligations and exercising our rights in the field of social security or social protection. This is concerned with preventing, managing, and overcoming situations that would adversely affect people’s wellbeing. Examples of this allow us to disclose your information to public services and organisations in the event that your wellbeing appears at risk.

Legal claims (“LC”)

Where we need to process your information for the establishment, exercise, or defence of legal claims this basis allows us to share information with our legal advisors and insurers.

Medical purposes (“MP”)

We will share information which facilitates your medical treatment and the management of healthcare services but, of course, only with those who have a legitimate need to know.

We hold your information so that you can join us for a retreat. Providing this information allows us to:

- Contact you if we need to send you more information about the retreat you are attending – **C, LI,**
- Be aware of any dietary or health constraints (such as allergies, gluten or dairy free requirements) that you may have so that we can look to accommodating them when you are here. Similarly, we ask to know your gender and age to help us organise the sleeping arrangements to best suit you – **LO, VI, MP**
- Contact a partner, relative or friend of yours should an urgent reason occur – **VI, MP**
- Know what other information (such as directions, car sharers or general advice) may be helpful to you – **C, LI**
- Help us to identify and collate your payments – **C, LI**
- Gain a general idea about how people are learning about Gayles (such as via web searches or word of mouth etc) - **LI**

How do we share your information with third parties?

We use the Apple Mail application on our computers and Google Mail provides the retreat email address; contact details are automatically retained on their cloud-based systems. These companies

have opted in to the Privacy Shield Agreement and your details will not otherwise be transferred out of the EEEA. We do not share your information with any other third parties.

Retention of information

When you send us a completed booking form it is saved in a dedicated folder for that retreat on a password-protected computer. We also print a paper copy for a retreat-specific folder which is kept in a closed filing cabinet. We delete the digital version and destroy the physical copy no later than one month after your stay and we do not retain any of the information on them. This is so that we have your details to hand for a safe period should, for example, lost property be found after you have left or where concerns for your welfare may require us to contact you. Your information stored on iCloud or with Google will generally be removed after (a further) 30 days but may take up to sixty.

Mailing list

If you join our mailing list we keep only your name and email address on our Contacts list (which is stored on iCloud using Two-Factor Authentication security) and you can unsubscribe at any time by emailing Roz or Derry at info@retreattogayles.co.uk You are always welcome to contact us if you would like to check or change any details we hold about you.

Your rights

The GDPR gives you certain rights regarding your information. Some of these rights are new and others build on your existing rights. The rights that you have under the new legislation are as follows:

Rectification: if we hold incorrect information about you you may ask us to correct it.

Access: you may ask what information we hold about you and for us to provide you with a copy of it. This is usually referred to as making a subject access request.

Deletion: you may ask us to delete information that we hold about you in certain circumstances. This includes where we no longer need the information.

Portability: you may request the transfer of your information to you or to a third party in a format that can be read by computer where: (a) the information was provided by you; (b) we are relying on consent or contract as our legal basis for holding your information; and (c) the information is held and used by us on a computer (or other mobile or handheld device).

Object: you may object to us using your information where:

- we are using it for direct marketing purposes;
- we are relying on the legitimate interests basis to use it.

Restriction: our use of information about you may be restricted at times, for example, if you tell us information is inaccurate we may only use it for limited purposes while we check its accuracy.

More than one basis

Occasionally we will rely on more than one basis for a particular use of your information. This is shown above by the initials next to our processing activities. Additionally, we may switch from one basis to another if circumstances change.

Further information

This privacy notice gives you the rights as set out in the Data Protection Act 2018 and is not intended to give you any rights which you did not already have.

If you would like to discuss this notice any further or have any questions about your personal information and the way in which Gayles uses it, please contact us on info@retreattogayles.co.uk or telephone us on 07721 023 845

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: ico.org.uk

Of course, we will update this policy from time to time; please visit our website to view the latest version.