

Privacy Policy

This website is operated by Crowndell Consulting Limited (company number: 033832224, registered address: Lewinnick Lodge, Pentire Headland, Newquay, TR7 1QD).

At Crowndell Consulting Limited, we are committed to the protection, rights and privacy of guests, visitors and staff, both at our venues and through our online communications.

This policy applies to data processing at all venues and via all websites under the Crowndell Consulting Limited portfolio. It explains when and why we collect information about people, how this information is used and the conditions we may disclose it to others and how we keep it secure. If you do not agree to the following policy you may wish to cease using this website.

Websites covered in this privacy policy include:

- www.lewinnicklodge.co.uk
- www.theplumemitchell.co.uk

This policy does not extend to any external websites which are linked to from our site. If using a third party website to book or for further services, please refer to that website's privacy policy for more information.

Questions regarding this policy and our privacy practices should be directed to marketing@hospitalitycornwall.com or by writing to The Marketing Team, Lewinnick Lodge, Pentire Head, Newquay, TR7 1QD. You may also call us on 01637 878117.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, Crowndell Consulting Ltd.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

Processing your personal data

Under the GDPR (General Data Protection Regulation) we control and process any personal information about you electronically using the following lawful bases:

- We are registered with the ICO under the Data Protection Register. Our registration number is: A8413652.

Consent and what personal data means

“Personal data” means any information collected and logged in a format that allows you to be identified personally, either directly, such as your name, or indirectly, such as a telephone number, as a person. Before providing us with this information, we recommend that you read this privacy policy. This forms part of the terms and conditions that govern our venue services. By accepting these terms and conditions, you expressly accept the provisions of this policy.

Your rights under the GDPR

Under the GDPR your rights are as follows:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You can read more about [your rights in detail here](#).

If you wish to exercise any of the rights set out above, please contact us. There will be no fee to access any of your personal data or any of your other rights listed above. However, if requests are unfounded, excessive or repetitive, we may charge a reasonable fee. In this circumstance, we may also refuse to comply with your request.

In the case of a request to access personal information, we may need you to help us confirm your identity by supplying specific information about yourself. This is to ensure that only the person with the right to access the data is receiving it.

We handle subject access requests in accordance with the GDPR. We will try to respond to all legitimate requests within one month, though this could take longer if the request is unusually complex or there are a number of requests. In this instance, you will be notified and we will keep you updated.

You also have the right to complain to the ICO (www.ico.org.uk) if you feel there is a problem with the way we are handling your data.

What information do we collect from you?

Some data is collected through our site automatically through the use of Cookies. Please refer to our section on “Cookies” for more information.

All other data is only recorded if voluntarily submitted by you. In the event of marketing communications, your data will only be used with prior consent. For more information on email marketing and communications, view our sections on “Marketing” and “Email marketing messages and subscriptions”.

Depending on your use of our services or website, we may collect some of the following data:

1. Contact details (name, email, phone number, address)
2. Personal information (date of birth, nationality, medical conditions)
3. Interests and preferences
4. Your credit card number (for transaction and reservation purposes)
5. Arrival/departure dates
6. Questions and comments during or following meal or hotel stay

In relation to children (under 16), information requested is limited to age and must only be supplied with a parent or guardian’s permission. Further information is voluntarily supplied by a parent or guardian with their permission.

When is your personal information collected?

We may request personal details from you in the event of the following:

1. Competitions, customer surveys, newsletter subscriptions or other marketing purposes or events
2. When reserving a table or a room in one of our venues
3. During check-in and when paying
4. In the case of a complaint or dispute
5. Via internet activities – for example, when visiting our websites or when using online reservation, forms, or company social media networks

Why and how is your information used?

We may use your information to:

- Ensure you are having the most efficient and effective online experience
- Enable you to participate in interactive features of the site
- Provide you with information relating to our website, product or our services that you request from us
- Provide you with information on other products that we feel may be of interest to you in line with those you have previously expressed an interest in via our website
- Process a booking you have made
- Meet our obligations arising from any contracts entered into by you and us
- For dealing with entries into a competition
- To seek your views or comments on the services we provide
- To notify you about any changes to our website, including improvements, and service or product changes
- Send you communications which you have requested and that may be of interest to you. These may include information about stays, events, promotions, offers, job offers, information about the hotel and the surrounding area and replies to requests and bookings enquiries/confirmations

- For our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website
- Administer this website
- If you consent, to notify you of products or special offers that may be of interest to you
- Apply rewards to returning customers

Who has access to your information?

In order to offer you the best service, personal data may be shared or given access to authorised personnel within the Crowndell Consulting Ltd team. This may include restaurant or hotel staff (where necessary), reservation staff, IT and finance departments. In the case of an emergency, it may also include medical services or legal services if applicable. Those given access to personal information will be trained and authorised to handle such data.

Third parties

Data will never be sold or rented to third parties and they will not have access to your information for marketing purposes.

However, we do have some third party service providers working on our behalf. In this instance, we will pass on information to our third party service providers for the purposes of completing tasks and providing services to you on our behalf (eg. processing payments on our behalf and sending confirmation email). They will not have access to your information for their own direct marketing purposes, unless this has been requested by yourself or is required by law (in the case of preventing fraud or crime). Only the information necessary to complete the task is shared.

We also work in association with some third party product providers. These include Online Travel Agents, such as Booking.com. When you enquire about or book with these third parties, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a data controller of your information and therefore please refer to their privacy policy when booking. These third-party product providers will share required information about you with us, such as your name, the room type purchased and dates of the stay. This is then stored and processed in accordance with this privacy policy.

When you are using our secure online booking system, your purchase is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. Please contact us for information on secure transactions.

Retention of data

We review our retention periods for personal information on a regular basis. Crowndell Consulting Ltd will hold onto your information for as long as is reasonably necessary. This will include for as long as you have a booking with us, or for as long as is necessary to provide support-related reporting or accounting purposes.

We may also hold onto personal data in order to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse or to enforce our terms and conditions. We may also keep hold of your information as required for any relevant activity, or as long as is outlined in any relevant contract you hold with us.

Personal data may also be anonymised so that it can no longer be associated with you for research or statistical purposes. In this case, we may use this information indefinitely without further notice to you.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. For example:

- Standards of security and protection are regularly updated as necessary to meet business needs and regulatory requirements.
- We have measures in place to protect against the likes of accidental loss and unauthorised access, use, destruction or disclosure of data.
- There are restrictions in place on access to personal information, both physically and on computer software systems, to enable data to be stored and transferred securely.
- We have a data breach policy in place, to limit damage in the unlikely event of a GDPR breach.
- All employees who require access to personal information in their daily role are required to undergo training on the correct method of handling data and other sensitive information.
- Steps are in place to ensure that employees act in accordance with our information security policies and procedures.

Protecting personal data during international transfers

Information which you provide to us may be transferred to countries outside the European Union (“EU”), in order to fulfil the services offered to you on this website. In some cases, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Marketing

It is your choice if you do or do not wish to receive information from our venues and you will not be contacted for marketing purposes unless you have opted in. If you have opted in but you no longer want to receive direct marketing communications from us, then you can change your preferences or completely unsubscribe.

Here’s how to stop receiving marketing communications:

- Click the 'unsubscribe' or 'change preferences' link at the bottom of marketing emails sent to you
- Email marketing@hospitalitycornwall.com or telephone 01637 878117.

Requests will be processed within 7 days.

Email marketing messages and subscriptions

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software/applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, IP addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations, will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR.

We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences/the information we hold about you at any time. All you need to do is unsubscribe on the bottom of marketing emails or call us on 01637 878117. You can also email marketing@hospitalitycornwall.com.

Our EMS provider is currently Mailchimp. We may hold the following information about you within our EMS system:

- Email address
- Name
- Location

CCTV Information Notice for Crowndell Consulting Ltd

Crowndell Consulting Ltd manages the operation of CCTV on both of its hotel sites, including around the entrance and exterior of the buildings. On visiting either venue, we may capture CCTV footage of you.

- What is this footage used for?

The footage we record is used for the prevention and detection of crime and to protect public safety on our premises.

We will only share CCTV footage where we are legally obliged to do so, or where we are allowed to do so under exemptions in the Data Protection Act – for example for the prevention or detection of crime.

- Where is it and how is the footage stored?

Cameras operate at various locations around each site, with appropriate signage in place to inform the public that they be being recorded. This personal information may include your activities, your face, car registration details and other visual information about you which is recorded on our CCTV system.

Only those who are authorised may have access to CCTV footage and systems are kept in rooms with keypad locks. Footage is then stored for up to 30 days, upon which time the data is automatically deleted.

- When might footage be stored for longer?

Footage may be kept for longer than the standard retention time following requests from:

The police and other law enforcement agencies: to carry out policing, assist investigations, trace missing people and investigate alleged criminal activities.

The security services: where relevant for matters of national security.

People who have been injured, attacked or had property damaged or stolen and their insurance providers: to assist them with any criminal or civil investigations or legal proceedings.

People who have been involved in road traffic accidents and their insurance providers: to assist with insurance claims, legal claims and investigations.

Private and other investigators: to aid their investigations.

Any relevant regulators: where we are required to do so by law or to assist with their investigations or initiatives, and this includes but is not limited to the Information Commissioner's Office.

This period can vary as it will depend upon the circumstances of the particular case, but for criminal or civil legal proceedings this could mean that the personal information is retained until after the legal case and any appeals have been concluded (which could be up to several years).

Once no longer required, we will then delete the personal information.

- Who do we share your personal information with?

We share your personal information with the following parties:

Suppliers, service providers and advisors to us: to manage and operate the CCTV system as our data processor and also organisations that provide us with legal, property and insurance advice.

Joint data controllers: who may jointly operate and maintain the CCTV system with us.

We do not disclose personal information to anyone else except as set out above unless we have your consent, or we are legally obliged to do so. We do not sell your data.

- What are your rights?

You have the right to see footage that you appear in and you can make this request by contacting Crowndell Consulting Ltd via the details included in this document.

Safeguards are in place to ensure that this data is kept secure and the privacy of individuals is protected.

Cookies

We use cookies on our websites to provide you with a better user experience. We do this by placing a small text file on your device/computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display or to keep you logged into the website where applicable.

Some cookies are required to enjoy and use the full functionality of our websites, also allowing the website to recognise you next time you visit. Cookies allow us to ensure you have the best user experience, as well as help us improve our website and deliver a more personalised experience.

You can switch off cookies by adjusting your browser preferences or using a dedicated browser extension.

IP Addresses

We may collect information about your computer, including but not limited to (where available), your IP address, operating system and browser type for administration purposes and to produce internal reports. This is statistical data relating to a web user's browsing actions and patterns and does not specifically identify you as an individual.

Changes

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

We endeavour to keep our records as up-to-date as possible. If you feel that you need to update your personal data held by us, please call us on 01637 878117 or email marketing@hospitalitycornwall.com. You can also write to: The Marketing Team, Lewinnick Lodge, Pentire Headland, Newquay, TR7 1QD.

Review of this policy

This policy is under regular review and will be updated as and when needed. Users are recommended to check this page from time to time to ensure they are happy with any changes.

Resources & further information

- [Overview of the GDPR - General Data Protection Regulation](#)
- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)

- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)