

## Privacy Policy Content

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### 1. Who We Are

As a management company of several sites throughout the United Kingdom, here at Planning Solutions Limited (Registered 3138503), (Chilworthpoint, 1 Chilworth Road, Southampton, Hampshire, SO16 7JQ) we ensure that personal data throughout our business, is processed and stored correctly in full compliance to the new General Data Practice Regulation (25th May 2018). We may change this privacy policy at any point to ensure we continue to further improve our procedures and organisation, which will be effective immediately, dated at the bottom of this document.

### 2. Data Is For

Data received within our business is used for administrative and marketing purposes, to ensure communication with those external to our business, are kept to the highest standard. As a company always looking to better our products, our aim is to meet the needs of our guests via planning and investment, with data used to ensure success. Our customer information is never sold to third parties.

We may use and disclose personal information for the following purposes:

(a) To market use of our services to you and others. If you use any of our services and we think you might benefit from using another service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email we send. In addition, we may use information we collect in order to advertise our services to you or suggest additional features of our services that you might consider using.

(b) To send you informational and promotional content in accordance with your marketing preferences. You can stop receiving our promotional emails by following the unsubscribe instructions included in every email.

(c) To bill and collect money owed to us. This includes sending you emails, invoices, receipts, and alerting you if we need to process an alternative method of payment. We use third parties for secure credit card transaction processing, and we send billing information to those third parties to process your orders and credit card payments. (Please also see content 5 – section C)

- (d) To send you System Alert messages. For example, we may inform you of temporary or permanent changes to our services, such as planned outages, new features, version updates, releases, abuse warnings, and changes to our Privacy Policy.
- (e) To communicate with our Members about their account and provide customer support.
- (f) To enforce compliance with our Terms of Use and applicable law. This may include developing tools and algorithms that help us prevent violations.
- (g) To protect the rights and safety of others, as well as our own.
- (h) To meet legal requirements, including complying with court orders, valid discovery requests, and other appropriate legal mechanisms.
- (i) To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- (j) To prosecute and defend a court, arbitration, or similar legal proceeding.
- (k) To respond to lawful requests by public authorities to meet national security or law enforcement requirements.
- (l) To be able to process donations securely, including Gift Aid for the future development of our sites. This requires us submitting information to HMRC and the charitable trusts associated with the submission.
- (m) To provide, support, and improve the services we offer. This includes our use of the data that our Members provide us in order to enable our Members to use the services to communicate with us. When we do have to share personal information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the personal information we transfer to them in a manner that is consistent with this policy.
- (n) To transfer your information in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this Privacy Policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our website.

### **3. Uses & Collection of Data**

(A) Social media platforms and widgets. Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. We also maintain presences on social media platforms including Facebook, Twitter, and Instagram. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

(b) Links to third-party websites whose servers could be held in other countries. Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Website you visit.

(c) We use web beacons on our Websites and in our emails. When we send emails to Members, we may track behaviour such as who opened the emails and who clicked the links. This allows us to measure the performance of our email campaigns and to improve our features for specific segments

of Members. To do this, we include single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

(d) When you use the services or browse one of our websites, we may collect information about your visit to our websites, your usage of the services, and your web browsing. That information may include your IP address, your operating system, your browser ID, your browsing activity, and other information about how you interacted with our websites or other websites. We may collect this information as a part of log files as well as using cookies or other technologies.

(e) We may receive information about how and when you use our services, store it in encrypted log files or other types of files associated with your account, and link it to other information we collect about you.

(f) Any information submitted for marketing purposes is only used as such. Data will only be actioned after being voluntarily opted in by the persons whose details are (Please also see Category 7. Rights)

(g) You can book via telephone communications for our events and accommodation. Bookings, as a subject, are proposed to include schedule of time and date. A booking can also include meetings and functions. You will be verbally asked if we can process you to be opted in and be in receipt of marketing material (Please also see Category 7. Rights)

(h) We advise that we will, from time to time, undertake photography and videography for promotional purposes. We are happy to explain the days task and will, wherever possible, ensure your wishes are adhered to if you are concerned of this. We will have appropriate notices up and consent forms when we are carrying out photography or videography.

(i) CCTV is currently active on our sites for security reasons. These are located at appropriate locations which do not impose on your freedoms. CCTV captures are available for submission to a designated authority when requested (Please see Category 2. Data Is For - k) .

#### **4. Access**

We will give an individual access to any personal information we hold about them within 30 days of any request for that information. Individuals may request to access, correct, amend or delete information we hold about them by contacting us. Unless it is prohibited by law, we will remove any personal information from our servers at your request. There is no charge for an individual to request access.

#### **5. Security**

(a) If a security breach causes an unauthorized intrusion into our system that materially affects you or people on your distribution lists, then Planning Solutions Limited will notify you as soon as possible and later report the action we took in response.

(b) We take reasonable and appropriate measures to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information.

(c) Our credit card processing vendors use security measures to protect your information both during the transaction and after it is complete. Our vendors utilise encryption and are certified as compliant with card association security initiatives.

(d) Our booking accounts require a username and password to log in. You must keep your username and password secure, and never disclose it to a third party. Because the information of your logon is

so sensitive, account passwords are encrypted, which means we cannot see your passwords. We cannot resend forgotten passwords either. We will only reset them.

(e) All reasonable efforts are made to ensure that any external communication or transfer of data to utilise tools via websites registered to countries outside of the United Kingdom are vetted for security and compliance to coincide with our company standards.

## **6. How Long We Hold Your Data For**

Some of the information you provide to us will be necessary to carry out repeated tasks, such as verifying your identity or payment details when signing in to use an account, providing our services to you or when you are using an online checkout. We will keep this information for as long as you remain a registered user of any of our sites and for so long as reasonably necessary. After this time, we may need to hold your personal data in order to meet our financial obligations or identify or resolve issues or causes of action. If your account is inactive for more than five years and you are no longer paying for a service, we reserve the right to delete any information you have provided to us

## **7. Rights**

Under the General Data Protection Regulation, you have a number of rights with respect to your personal information, which are:

(a) You are entitled to have your personal information updated to ensure it is up to date and accurate. In order to maintain the accuracy of the information we hold, you can update your personal details through your online accounts pages or by sending us an email to the site you wish to update from the list at the bottom of this document.

(b) You have the right to withdraw your consent to any processing that is currently being done under your consent, such as marketing. Consent can be withdrawn by updating your preferences online via link at the bottom of every email. You can also email to the site you wish to update from the list at the bottom of this document.

(c) You have the right to receive a copy of the personal information we hold about you. You can do this by contacting the site you wish to contact from the list at the bottom of this document or from the email address attached to your account, providing the full name attached to your account.

(d) You can request that we delete personal information in certain circumstances. These will be specific to each case. You can do this by contacting the site from the contact list at the bottom of this document or from the email address attached to your account, providing the full name attached to your account.

(e) You have the right to ask us to transfer the personal information that you have given us to another controller.

(f) You can request a restriction on the processing of your data in some limited circumstances. Examples are concerns over data accuracy or we no longer need to hold your data but you have requested its retention by us to aid you in a legal matter. You can do this by contacting the site from the contact list at the bottom of this document or from the email address attached to your account, providing the full name attached to your account.

(g) You have the right to request that we stop processing your data for marketing purposes and in other limited circumstances such as asking us not to process your data by wholly automated means or not to analyse your information for targeted content etc. (also known as profiling).

## **8. The Right To Complain To The ICO**

The data protection laws in the UK are regulated and enforced by the Information Commissioner's Office (ICO). Each individual has the right to raise a concern/complaint to the ICO if they have any concerns about how their personal information and/or privacy is treated. You can do this via the ICO's website, follow the link or have an online Live Chat.

Website - <https://ico.org.uk/concerns>

Call the ICO helpline - 0303 123 1113

Email - [casework@ico.org.uk](mailto:casework@ico.org.uk)

Postal address -  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow, Cheshire,  
SK9 5AF

## **9. Questions & Concerns**

If you have any questions or comments, or if you want to update, delete, or change any personal information we hold, or you have a concern about the way in which we have handled any privacy matter, please send us an email to the site from the contact list at the bottom of this document. You may also contact us by postal mail at: Planning Solutions Limited, 9 Leigh Road, Havant, PO9 2ES

For Further Information, please contact us directly at:

- Vertigo Adventures – [info@vertigoadventures.co.uk](mailto:info@vertigoadventures.co.uk)

16/05/2018 C.Williamson