

Lower House Farm Privacy Policy – May 2018

1. Introduction

- 1.1 Lower House Farm Partnership and Lower House Farms Ltd will safeguard the privacy of our website visitors and non-web-site customers and suppliers and handle any personal information by the following means.
- 1.2 We have no Google Analytics and therefore no requirement for Cookies.
- 1.3 By using our website and agreeing to this policy, you consent to our contacting you in reply to your enquiry about our business or services that we offer, eg. Hiring of The Stables Conference Centre or doing business with us.

2. Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
 - a) Information that you provide to us when completing a Contact form under 'Make an Enquiry' page, including your email address and contact phone number, required to communicate with you in order to answer your enquiry (usually a name, phone number, email and/or company address);
 - b) Information that you may provide to us for the purpose of subscribing to our email newsletters, should we ever decide to send these out (including your name and email address);
 - c) Information relating to any purchases you make of our services or any other transactions that you enter into (including your name, address, telephone number, email address);
 - d) Any other personal information that you choose to send to us.
 - e) All customer contact information – ie. name and company address – will be held on our computer and on paper in the form of an invoice. This is a document which is required by law to be kept on file on our premises for 7 years.
- 2.2 Should you ever wish to disclose to us the personal information of another person, you must first obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

3. Using personal information

- 3.1 Personal information received by us from a 'Make and Enquiry' form submitted to us by email via our website will be used for the following purposes:

We may use your personal information to:

 - a) Send you/your company an invoice for our services that have been provided to you;
 - b) Send remittances or reminders for overdue invoices. On occasion we will phone your company to chase up overdue payments;
 - c) Send you non-marketing communications in relation to the business that you are carrying out with Lower House Farm Partnership/Lower House Farms Ltd;
 - d) Send you email communications in relation to the business that you are carrying out with Lower House Farm Partnership / Lower House Farms Ltd;
 - e) Send you an email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- 3.2 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us – eg. Testimony Page.
- 3.3 We will not supply your personal information to any third party for the purpose of theirs or any other third party's direct marketing.

4. Disclosing personal information

- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal information:
 - a) To the extent that we are required to do so by law;
 - b) In connection with any ongoing or prospective legal proceedings;
 - c) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - d) In order to fulfil the business to business service that you have contacted us about.
 - e) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
 - f) Except as provided in this policy, we will not provide your personal information to third parties.

5. International data transfers

- 5.1 Lower House Farm only operates within the UK.

6. Retaining personal information

- 6.1 This section sets out our data retention policy and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 6.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose.
- 6.3 Notwithstanding the other provisions of this section, we will retain documents (including electronic documents) containing personal data:
 - a) To the extent that we are required to do so by law;
 - b) If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

- c) In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

7. Security of personal information

- 7.1 We will take reasonable technical and organisation precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 We will store all the personal information you provide on our secure (password and firewall protected) servers.

8. Amendments

- 8.1 We may update this policy from time to time by publishing an new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

9. Your Rights

- 9.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - The supply of appropriate evidence of your identity (for this purpose, we will accept a photocopy of your passport certified by a solicitor or bank, plus an original copy of a utility bill showing your current address).
- 9.2 We may withhold personal information that you request to the extent permitted by law.
- 9.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 9.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of this use of your personal information for marketing purposes.

10. Third Party websites

- 10.1 Our website may sometimes include hyperlinks to , or details of, third party companies or websites.
- 10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

11. Updating information

- 11.1 Please contact us on the details provided in this policy, should you wish to update any information.

12. CCTV

- 12.1 We use CCTV on our premises primarily for crime prevention purposes. No footage is played back or passed to any third party.
- 12.2 Footage would only be passed to the Police at their request.
- 12.3 It is also used to monitor the arrival and departure of delivery lorries to the farm site.
- 12.4 We are aware that delegates attending our small conference venue are captured on camera and therefore display plentiful signage around the premises to inform them that there are CCTV cameras on the premises.
- 12.5 No camera on our premises overlooks a neighbouring property.
- 12.6 The images of our CCTV are of high quality.
- 12.7 We review the need for CCTV on an annual basis and we have a maintenance arrangement with the installer.
- 12.8 The system is only operated by the Data Protection Officer and one other Director. Footage is stored for a period of 2 months before being wiped from the system.

13. Data Protection Registration

- 13.1 We are registered as a data controller with the UK Information Commissioner's Office. The Data Protection Officer, Controller and Processor is Alison Gilbert (also a Director). We have carried out a Data Protection Impact Assessment (DPIA) and conclude that within Lower House Farm Partnership and Lower House Farms Ltd, data processing is highly unlikely to result in a high risk to individuals.
- 13.2 Our data protection registration numbers are:
 - Lower House Farm Partnership = ZA388188
 - Lower House Farms Ltd A8335429 (application ref – we are awaiting registration no. from ICO).

14. Our Details

- 14.1 Our website is owned and operated by Lower House Farm
- 14.2 We are registered in England and Wales
 - Lower House Farms Ltd: VAT – 252039190, Company No. 6433141
 - Lower House Farm Partnership: VAT – 231487513
- 14.3 Our principal place of business is at Lower House Farm, Canon Frome, Nr Ledbury, Herefordshire, HR8 2TG
- 14.4 You can contact us:
 - a) By post, using the postal address above in '14.3'
 - b) Using our website contact form
 - c) By telephone, (01531) 670730 or
 - d) By one of these email addresses : enquiries@thestablesconferencecentre.co.uk ; bruce@lowerhousefarm.com; bl.gilbert@btopenworld.co.uk

15. Cookie Policy - Our website does not use Cookies.