

# **C Mountain Lodges Limited Privacy Statement**

## Who we are

This is the privacy statement of C Mountain Lodges Limited trading as Chardon Mountain Lodges (CML, us or we).

# Types of personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
Financial	Your financial position, status and history.
Social-demographic	Details about your work or profession, nationality, education and where you fit in to various social or income groupings.
Contractual	Details about the services we have provided to you in the past and future services we will provide.
Special types of personal data	Some types of personal data are defined as special. We will only collect and use these types of data if the law allows us to:  Racial or ethnic origin Religious or philosophical beliefs Genetic or bio-metric data Health data including gender Criminal convictions data



## How we use your personal information

In general terms, we collect and use personal information to:

- deliver our services and meet our legal responsibilities
- verify your identity where this is required
- contact you by post, email or telephone
- understand your needs and how they may be met
- maintain our records
- process financial transactions
- prevent and detect crime, fraud or corruption
- improve our website
- better understand what you like and don't like, want and do not want
- contact you with offers and information about our products and services, and carefully selected third parties
- Of course, you can opt-out of receiving promotional communications at any time.

More specifically, the table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul> <li>To deliver our services</li> <li>To make and manage customer payments</li> <li>To manage fees, charges and interest due on customer accounts</li> <li>To collect and recover money that is owed to us</li> </ul>	<ul> <li>Contractual performance</li> <li>Legitimate interests</li> <li>Legal obligations</li> </ul>	<ul> <li>Being efficient about how we fulfil our legal and contractual duties</li> <li>Complying with regulations that apply to us</li> </ul>
<ul> <li>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit</li> </ul>	<ul> <li>Legitimate interests</li> <li>Legal obligations</li> </ul>	<ul> <li>Being efficient about how we fulfil our legal duties</li> <li>Complying with regulations that apply to us</li> </ul>
To exercise our rights set out in contracts and agreements	Contractual performance	



## Where we collect your personal information from

We may collect personal information about you (or your business) from the following sources:

Data you give to us: e.g. When you talk to us over the phone, send emails to us, or send us letters, complete surveys and end of holiday feedback forms.

Data we collect when you use our services: e.g. Payment and transaction data. Details of payment cards used are only handled by a secure online payment agent; we do not take or keep this information.

Data from third parties that we work with: e.g. Publicly available resources, companies that introduce you to us etc.

## Who we share your information with

We may share your personal information with the following third parties:

Chardon Service Company Limited, and SARL Chardon Transfer Service, STVI – the ski lift authority in Val d'Isere, ski guides, ski equipment providers, restaurants, and other providers of services that you request us to provide for you or your organisation.

## If you choose not to give your personal information

If you choose not to give your personal information that may delay or prohibit us from meeting our obligations / lead to us cancelling the service, you have with us.

#### Where we hold your personal information internationally

We will not transfer your data outside the European Economic Area.

#### Using our website

Chardon Mountain Lodges requests personal information when you sign up for our services, including your name, email address and other information in the interests of providing the best possible service to all visitors to our site. We also collect other information about your use of our website.

So that we can continually improve the quality of our service, we also view customer traffic patterns. We do not collect information such as your name or address that can help us identify a visitor. We only collect information that can identify a visitor when the visitor provides it of their own volition.



## Your rights

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see Withdrawing consent to using your information below
- You have validly objected to our use of your personal information –
   see Objecting to how we may use your information below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** — You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information — in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information, but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.



**Portability** – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine-readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

**Automated processing** – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you

**Withdrawing consent using your information** — Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

#### Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement may also be obtained from our contact details below.

This privacy statement was last updated on 24<sup>th</sup> May 2018.

## **Complaints**

We seek to resolve directly all complaints about how we handle personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane,

Wilmslow, SK9 5AF



## Disclosure of your information

We value your privacy. We never release your details to third parties by default and will only do so with your explicit consent. Your privacy is important to us. We can reassure you that your email address will be used for information and promotional emails only, we do not sell or share our database with any other organisations and your email address and any personal information is stored securely on our database server.

Our website may have links to web sites and these may not be covered by our Privacy Policy.

In the event of a sale, merger or transfer or sale of us or any group company we reserve the right to transfer information to a third party who will be obliged to adhere to the terms of this Privacy Policy.

#### Contact information and further advice

If you have any questions about this Privacy Policy, the use of your personal information or if you wish to request us to stop using your information in any way, please write to our appointed Data Protection Officer:

Name: Sam Crabb

Address: C Mountain Lodges Limited, 14 Riversdale Crescent, Edinburgh, EH12

5QT, UK

Email: samcrabb@lechardonvaldisere.com