



CLINTON DEVON ESTATES

Privacy Policy – May 2018

This privacy policy applies to Clinton Devon Estates and includes activity conducted by East Devon Pebblebed Heaths Conservation Trust and Bicton Arena (a full list of company entities can be requested).

This statement describes the types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

The contents of this statement may change from time to time, so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

You can exercise the above rights and/or manage your information by contacting us using the details as follows:

Post: Rolle Estate Office, Bicton Arena, East Budleigh, Devon, EX9 7BL

Email: mail@clintondevon.com or Tel: 01395 443881

If you are unhappy, you have the right to lodge a complaint with the Information Commissioners Office (ICO), the UK Advisory Authority for data protection issues. www.ico.org.uk

Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Email: casework@ico.org.uk or Tel: 0303 123 1113

We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Ownership of Information

Clinton Devon Estates is the sole owner of any information collected. We will not sell, share, or rent this information to others in ways different from that disclosed in this statement.

Types of data we collect

Sometimes we need to collect personal data by law, or under the terms of the contract with have with you. If you fail to provide that data when we request it, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with goods or services) In this case, we may have to cancel the service with you, but we will notify you if this is the case at the time.

We do not collect any special categories of personal data about you, this includes details about your race, ethnicity, religious or philosophical beliefs, political opinions, trade union membership, nor do we collect any information about criminal convictions and offences.

When opting in to receive specific correspondence about Clinton Devon Estates and associated activities we will request your name, email address and type of interest in our activities. This information is gathered to enabled us to contact you with relevant articles and information pertaining to your interest.

We collect information about you when you engage with our website, register an interest in a property or land, apply for licences issued by the Estate, engage with the Estate about land management or sporting activities. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.



The information we collect includes some or all the following:

- Name (including title)
- Address
- Phone number
- Date of birth
- Email address
- The date and time you used our services
- The pages you visited on our website and how long you visited us for
- Your IP address
- The website address from which you accessed our website
- Details of any transactions between you and us
- Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses) and company details
- Any information within correspondence you send to us

We obtain personal data from you when you:

- Contact us about Estate services and activity, including the rental of property or land
- Apply for permission to conduct activities on Estate land (for example, sporting rights)
- Supply a service to the Estate
- Register to volunteer
- Make a booking to attend an Estate activity
- Make a booking to attend an equestrian event or supply a service at an equestrian event
- Enquire about hiring facilities
- Enquire about sponsoring an equestrian event
- Sign up to receive our newsletters
- Use our website
- Submit information directly via sign up forms

Use of information

We will only process information that is necessary for the purpose for which it has been collected. We will never send you unsolicited 'junk' email or communications or share your personal information with anyone else who might. You will be asked if you wish to receive newsletters about the Estate and you always have the option not to receive this communication from us (and you can withdraw your consent or object at any time).

We may use your information:

- To provide you with information relating to Estate activity that you request from us
- To meet our obligations arising from any contracts entered into by you and us
- To seek your views or comments on the services we provide
- To send you communications which you have requested and that may be of interest to you. These may include information about events, properties, employment opportunities, information about the Estate and our partners.
- For our internal purposes including statistical or survey purposes, quality control, site performance and evaluation in order to improve our website
- To administer the websites

There are various ways in which we may use or process your personal information.

Consent:

Where you have provided your consent, we may use and process your information to contact you from time to time about relevant industry news updates and advice, events, training opportunities or information which we think may be of interest to you.



You can withdraw your consent at any time by contacting us on the details here or, in relation to any messages you receive, by using the unsubscribe option included in those messages.

Contractual performance:

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your expectations of the arrangements with you.

Legitimate Interests:

We may use and process your personal information where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so:

- To respond to correspondence, you send to us and fulfil the requests you make to us (for example, requests for information about properties, land, public access, agricultural arrangements, forestry operations, equestrian activity, sporting rights and other specific services);
- To provide services under contracts between us and third parties where such third parties are required to provide services to you or for subcontractors that we use to provide services to you (for example, contractors conducting works to maintain or repair a property).
- To analyse, evaluate and improve our services so that your use of our website and services are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
- To verify the accuracy of information that we hold about you to ensure improved communications;
- For network and information security purposes i.e. for us to take steps to protect your information against loss, damage, theft or unauthorised access;
- To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for particular purposes, we will keep a record of this on our suppression lists to be able to comply with your request)

Legal Obligation:

We may process your personal information to comply with legal requirements (for example, to comply with health, safety and/or environmental legislation).

Vital Interest:

Sometimes we will need to process your personal information to contact you if there is an urgent health, safety and/or environmental notice and we need to tell you about it.

Sharing Personal Data

We will only use any information that we collect about you lawfully (in accordance with the Data Protection Act 1998).

Your privacy is important to us and we confirm that we will never release your personal details to any third party for their mailing and marketing purposes. We will not share your data unless you have requested us to do so, or we are required to release information to a third party by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may pass your information to our third-party service providers, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to conduct maintenance work in properties). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service



and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Data security and access to your personal information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business and need to know. They would only process your personal data on our instructions and they are subject a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any particular regulator of a breach where we are legally required to do so. You always have the right to ask for a copy of the information Clinton Devon Estates hold about you.

The accuracy of your information is important to us. If your personal information changes or if any of the information we hold is inaccurate or out of date, please email us at: mail@clintondevon.com
Or write to us at: Clinton Devon Estates, Rolle Estate Office, Bicton Arena, East Budleigh, Devon EX9 7BL. Alternatively, you can telephone: 01395 443881

Data retention periods

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. By law we have to keep basic information about and transactional related information for tax purposes for six years after the completion of the terms of engagement. The data we keep may include contact, identity, financial and transaction date.

In some circumstances you may ask us to delete your data and we will do this subject to any legal obligation on us to retain it.

If we have a relationship with you, we hold your personal information for seven years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims.

If you have raised a complaint or concern regarding Estate activity we will retain your information for a period of seven years following the date of that complaint or query

Exceptions to this will be made where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law

Your legal rights and how to opt out

- You have the right as an individual to access the personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you.
- You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request.
- You can request erasure of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below) where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however that we may not always be able to comply with your request of



erasure for specific legal reasons which will be notified to you, if applicable at the time of your request.

Opt out of Information style communications

You have a choice about whether you wish to receive information from us.

If you no longer want to receive digital information and communications from us then you can change your preferences or completely unsubscribe in one of two ways:

Click the 'unsubscribe' or 'change preferences' link at the bottom of emails sent to you

Email mail@clintondevon.com or telephone 01395 443881 and we will process your request within seven days.

We will not contact you for purposes outside our required business correspondence by email, phone or text message unless you have given your prior consent.

16 or under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, advise us and confirm that you have your parent/guardian's permission beforehand whenever you provide us with personal information.

We keep this Policy under regular review. This Privacy Policy was last updated in May 2018.



Website Specific Data

Website Cookies

Like many other websites, the Clinton Devon Estates, East Devon Pebblebed Heaths Conservation Trust and Bicton Arena websites use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website. At Clinton Devon Estates, we want to reassure you that your privacy is respected and safe in our hands. We only ever collect information from you that helps us to help you get the most out of your visit to our site.

We may use a cookie to record previously established interests and preferences (via data submitted to us) to enhance the experience whilst using our site. Because the cookie is client side, i.e. on your hard drive, your privacy is in no way compromised. You may deactivate cookies in your web browser or reject the creation of a cookie depending on your personal preferences.

As with many other websites, we use cookies for several reasons, the main one being to monitor and measure what visitors do on our website. This allows us to know what areas of the site are popular, how often visitors come back, where they come from, whether they are using a PC or a mobile device and so on. Knowing how our site is being used means we can enhance users' experience in future.

If you still decide to opt out, you have two options:

- You can adjust the settings on your internet browser to prevent cookies being downloaded. How this is done varies according to which browser you are using, and we recommend you refer to the appropriate online help guides.
- You can opt out of receiving specifically those cookies we use to track how people are using our site.

IP Address Information

Each time you access information then we record what you access and the IP address you use to access the data. An IP address is a unique identifier given to you by your Internet provider when you connect to the Internet. This may differ each time you connect or be permanently assigned depending on your arrangements. We use these addresses to track your movements, analyse broad trends such as geographical location and by such improve our quality of service. IP addresses are not linked to personally identifiable information.

Links to Other External Sites

This web site may contain links to other sites. Clinton Devon Estates, East Devon Pebblebed Heaths and Bicton Arena cannot be held responsible for the privacy practices of other such sites. Please do not assume that other sites abide by our privacy standards. In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.