

# SANDWICH LEISURE HOLIDAY PARK

WOODNESBOROUGH ROAD, SANDWICH KENT, CT13 0AA

TEL: 01304 612681

Email: [info@sandwichleisurepark.co.uk](mailto:info@sandwichleisurepark.co.uk)

VAT REGISTRATION 176 1517 04

## GDPR DATA PRIVACY NOTICE

Last updated: 2 October 2026

### 1. Who We Are

Sandwich Leisure Holiday Park ("we", "us" or "our") is responsible for handling your personal information and protecting your privacy.

We are committed to protecting your personal data and handling it in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, as amended, and other applicable data protection legislation.

This Privacy Notice explains how we collect, use, store and share your personal information when you make a booking, stay at our park, own a holiday home on the park, contact us or otherwise interact with our business.

It also explains your rights in relation to your personal information and how you can exercise them.

This notice applies to customers, holidaymakers, visitors and holiday-home owners. It does not cover employees or job applicants, who are subject to separate privacy arrangements.

### 2. The Personal Data We Collect About You

We may collect, use, store and process the following categories of personal information, depending on your relationship with us.

#### Identity Information

- Full name and title.
- Date of birth, where required.
- Names of other guests included in a booking.
- Holiday-home ownership details.
- Information required to verify ownership or a transaction, where applicable.

#### Contact Information

- Home and correspondence addresses.
- Email addresses.
- Telephone and mobile numbers.

- Emergency contact details, where provided.

#### Booking and Holiday Information

- Arrival and departure dates.
- Booking references and accommodation details.
- Number of adults, children and infants.
- Information about dogs accompanying guests.
- Vehicle registration numbers.
- Special requests and correspondence relating to your booking or stay.
- Booking history, cancellations, amendments and payment status.

#### Holiday-Home Ownership Information

For holiday-home owners, we may also collect and hold:

- Holiday-home details, including make, model, location and ownership records.
- Licence agreements and associated documentation.
- Purchase, sale and transfer details.
- Details of buyers and sellers where a holiday home is transferred.
- Utility meter readings and related charges.
- Invoices, payments, outstanding balances and correspondence.
- Information required to administer the holiday-home licence and park rules.

#### Financial and Transaction Information

- Records of payments made to us.
- Invoices, refunds, outstanding balances and payment history.
- Details of charges relating to bookings, holiday-home ownership and other services.

We do not routinely store full debit or credit card details as part of our booking records. Card payments are processed through our card payment provider, Worldpay.

#### Vehicle and Security Information

- Vehicle registration numbers recorded through our Automatic Number Plate Recognition (ANPR) system.
- CCTV images and video footage captured around the park.
- Records of incidents, security matters or access-related enquiries, where applicable.

#### Technical and Website Information

When you use our website, we may collect technical information such as your IP address, browser type, device information and details of how you interact with our website, where applicable.

We may also collect information through cookies and similar technologies in accordance with our cookie arrangements.

We do not intentionally collect special category personal data, such as information about your health, religion, political opinions or ethnicity, as part of our ordinary booking and ownership processes. However, information of this nature may occasionally be provided to us voluntarily or incidentally, for example in correspondence or an incident report. Where this occurs, we will only process it where we have a lawful basis to do so.

### **3. How We Collect Your Personal Data**

We collect personal information in a number of ways, including:

Directly from you

- When you make a booking online, by telephone, by email or through other available booking channels.
- When you complete booking forms or provide guest information.
- When you purchase or own a holiday home on the park.
- When you enter into a holiday-home licence agreement or arrange a sale or transfer.
- When you contact us with an enquiry, complaint, request or feedback.
- When you make a payment or communicate with us about an account.

Automatically

- Through our CCTV and ANPR systems when you visit or enter the park.
- Through our website when you browse or interact with it, where applicable.

From third parties

- From booking system providers and payment service providers involved in processing your booking or payment.
- From buyers, sellers or their representatives when administering holiday-home transfers.
- From relevant authorities or other parties where information is lawfully provided to us.

### **4. How We Use Your Personal Data**

We only use your personal information where we have a lawful basis under data protection legislation.

The lawful bases we may rely on include:

- Contract: Where processing is necessary to enter into or fulfil a booking, licence agreement or other contract with you.
- Legal obligation: Where we are required to process information to comply with legal, tax, accounting or regulatory requirements.
- Legitimate interests: Where processing is necessary for our legitimate business interests, provided these are not overridden by your rights and interests.

- **Consent:** Where you have freely given consent for a specific purpose and consent is the appropriate lawful basis.

We may use your personal data for the following purposes:

| <b>Purpose</b>                                                                          | <b>Lawful basis</b>                                     |
|-----------------------------------------------------------------------------------------|---------------------------------------------------------|
| Processing and managing bookings, including confirmations, amendments and cancellations | Contract                                                |
| Communicating with you about your booking, stay or enquiry                              | Contract or legitimate interests                        |
| Managing holiday-home ownership, licence agreements, sales and transfers                | Contract and legitimate interests                       |
| Processing payments, invoices, refunds and outstanding balances                         | Contract and legal obligation                           |
| Maintaining customer and owner records                                                  | Contract, legal obligation or legitimate interests      |
| Managing park access, security and site safety through CCTV and ANPR                    | Legitimate interests                                    |
| Investigating incidents, complaints, disputes and security matters                      | Legitimate interests or legal obligation                |
| Recovering outstanding debts and enforcing contractual terms                            | Legitimate interests or contract                        |
| Maintaining financial, tax and accounting records                                       | Legal obligation                                        |
| Managing our IT systems, booking systems and website                                    | Legitimate interests                                    |
| Responding to requests from law enforcement or other authorised bodies                  | Legal obligation or legitimate interests, as applicable |
| Sending occasional marketing communications about our services, where permitted         | Consent or legitimate interests, as applicable          |

Where we rely on legitimate interests, these may include operating and managing the park, providing customer services, protecting our property and guests, maintaining security, preventing fraud and managing contractual relationships.

We will only process your personal data for the purposes for which it was collected, unless we reasonably consider that another purpose is compatible with the original purpose or another lawful basis permits the processing. Where required, we will inform you of any change.

## **5. Marketing Communications**

We may occasionally send you information about our park, accommodation, services, offers or other relevant updates.

We will only send marketing communications where permitted by applicable data protection and electronic marketing laws.

Where consent is required, we will obtain it before sending marketing communications. Where the law allows us to rely on the existing customer relationship, we will provide an appropriate opportunity to opt out when your details are collected and in each marketing communication.

You can ask us to stop sending you marketing communications at any time by contacting us at [info@sandwichleisurepark.co.uk](mailto:info@sandwichleisurepark.co.uk) or by using the unsubscribe option where one is provided.

Opting out of marketing will not affect service-related communications that are necessary for your booking, ownership or other contractual arrangements.

## **6. Who We Share Your Personal Data With**

We do not sell your personal information to third parties.

We may share your personal data with the following categories of organisations where necessary to operate our business, fulfil contractual obligations or comply with legal requirements.

### **Prophet Booking System – Backcourt Computers**

We use the Prophet Booking System, provided by Backcourt Computers, to manage bookings and customer information.

Personal information supplied as part of the booking process, excluding debit and credit card details, is stored within the Prophet Booking System.

We also use this system to store holiday-home ownership information, including ownership records and related administrative details.

Backcourt Computers provides and supports the booking system and processes personal information on our behalf.

### **Payment Providers – Worldpay and Opayo**

We use third-party payment providers to securely process debit and credit card payments.

- **Worldpay** processes card payments made through our on-site card terminal.
- **Opayo** processes online payments made through our website and booking system.

These providers process payment information in accordance with their own security and privacy policies. We do not routinely store full debit or credit card details within our own booking records.

Further information about how these providers handle personal information can be found in their respective privacy notices:

Worldpay: <https://privacy.worldpay.com/policies>

Opayo: <https://www.elavon.co.uk/>

### **Other Third Parties**

We may share relevant personal information with:

- Professional advisers, including accountants, solicitors and insurers.
- IT support providers and other service providers who assist in operating our business.
- Law enforcement agencies, regulatory authorities and other public bodies where required or legally permitted.

- Buyers, sellers or their authorised representatives when administering holiday-home sales and ownership transfers.

Where third parties process personal information on our behalf, we take appropriate steps to ensure that suitable data protection and security arrangements are in place.

## **7. International Transfers**

We use third-party service providers to support the operation of our business, including Worldpay, which processes card payments on our behalf.

Some of these providers may use systems, facilities or other service providers located outside the United Kingdom. As a result, your personal information may be accessed or transferred internationally as part of the services they provide.

Where personal information is transferred outside the United Kingdom, we will ensure that appropriate safeguards are in place in accordance with applicable data protection legislation to protect your information.

These safeguards may include adequacy regulations, international data transfer agreements or other approved contractual protections, where required.

## **8. Data Security**

We take appropriate technical and organisational measures to protect your personal information against accidental loss, unauthorised access, alteration, disclosure or misuse.

These measures include:

- Restricting access to personal information to authorised individuals who need it for their work.
- Using appropriate security measures to protect our computer systems and records.
- Taking reasonable steps to protect information held by third-party service providers.
- Maintaining procedures for identifying, managing and responding to suspected personal data breaches.

Although we take reasonable steps to protect your information, no method of storing or transmitting data can be guaranteed to be completely secure.

Where a personal data breach occurs, we will assess the incident and notify the Information Commissioner's Office (ICO) and affected individuals where required by law.

## **9. CCTV and Automatic Number Plate Recognition (ANPR)**

We operate CCTV and ANPR systems around Sandwich Leisure Holiday Park for security, safety and site management purposes.

### **CCTV**

CCTV cameras are used to monitor relevant areas of the park, help protect guests, owners and property, deter and investigate crime, and assist with the investigation of incidents or disputes.

CCTV footage may be reviewed by authorised personnel when necessary for these purposes and may be shared with law enforcement agencies or other authorised parties where lawful and appropriate.

## ANPR

Our ANPR system records vehicle registration numbers when vehicles enter and leave the park. This information is used for site access management, security, investigating incidents and helping to enforce park rules.

### Retention of CCTV and ANPR Information

CCTV footage and ANPR records are normally retained for up to 30 days, after which they are routinely overwritten or deleted.

Where footage or records are required in connection with an incident, complaint, investigation, legal claim or other legitimate purpose, relevant information may be retained for longer, but only for as long as necessary.

Access to CCTV and ANPR records is restricted to authorised individuals and is managed in accordance with applicable data protection legislation.

## 10. Data Retention

We only retain personal information for as long as necessary to fulfil the purposes for which it was collected, including meeting legal, accounting and reporting requirements.

Our standard retention period for customer, financial and holiday-home ownership records is 6 years.

| Type of information                                   | Retention period                                                                               |
|-------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Booking and customer records                          | 6 years                                                                                        |
| Financial records, invoices and payment records       | 6 years                                                                                        |
| Holiday-home ownership records and licence agreements | 6 years after the relevant ownership or contractual relationship ends                          |
| Holiday-home sale and transfer records                | 6 years                                                                                        |
| CCTV footage                                          | Up to 30 days                                                                                  |
| ANPR records                                          | Up to 30 days                                                                                  |
| General enquiries and correspondence                  | As necessary, normally up to 6 years where related to a booking, ownership or financial matter |
| Marketing information                                 | Until consent is withdrawn, an objection is received or the information is no longer required  |

Certain information, including CCTV footage and ANPR records, may be retained beyond the standard period where necessary to investigate an incident, resolve a dispute, establish or defend a legal claim, or comply with a legal obligation.

When personal information is no longer required, it will be securely deleted, destroyed or anonymised, as appropriate.

## 11. Your Data Protection Rights

Under data protection legislation, you have a number of rights in relation to your personal information. These rights are subject to certain conditions and exemptions.

Your rights may include:

#### Right of Access

You can request a copy of the personal information we hold about you. This is commonly known as a Subject Access Request (SAR).

#### Right to Rectification

You can ask us to correct personal information that is inaccurate or incomplete.

#### Right to Erasure

You can ask us to delete your personal information in certain circumstances, for example where it is no longer necessary for the purpose for which it was collected.

#### Right to Restrict Processing

You can ask us to restrict the use of your personal information in certain circumstances, such as where you dispute its accuracy.

#### Right to Data Portability

You may be entitled to receive personal information you have provided to us in a structured, commonly used and machine-readable format, and to request that it be transferred to another organisation where the legal requirements are met.

#### Right to Object

You can object to the processing of your personal information where we rely on legitimate interests as our lawful basis, subject to applicable legal conditions.

You have an absolute right to object to the use of your personal information for direct marketing.

#### Right to Withdraw Consent

Where we rely on your consent to process personal information, you can withdraw that consent at any time. This will not affect the lawfulness of processing carried out before consent was withdrawn.

These rights are not absolute, and there may be circumstances in which we are legally entitled or required to retain or continue processing certain information.

## **12. How to Exercise Your Rights**

If you wish to exercise any of your data protection rights or make a request relating to your personal information, please contact us using the details below.

Sandwich Leisure Holiday Park Woodnesborough Road Sandwich, Kent CT13 0AA

Email: [info@sandwichleisurepark.co.uk](mailto:info@sandwichleisurepark.co.uk) Telephone: 01304 612681

We may need to request information to verify your identity before responding to your request. This is to ensure that personal information is only disclosed to the correct individual.

We aim to respond to valid requests without undue delay and within one month of receiving your request. In certain circumstances, where requests are complex or numerous, this period may be

extended by up to a further two months. If an extension is necessary, we will inform you within the initial one-month period and explain why.

There is normally no charge for making a request. However, we may charge a reasonable fee or refuse to act on a request where it is manifestly unfounded or excessive, in accordance with applicable legislation.

### **13. Cookies and Our Website**

Our website may use cookies and similar technologies to help it operate, improve functionality, understand website usage and, where applicable, support other permitted purposes.

Some cookies are necessary for the website to function, while others may require your consent before they are used.

You can manage cookies through the cookie settings made available on our website and through your browser settings.

Disabling certain cookies may affect the functionality of parts of the website.

Further information about the cookies used on our website may be provided through our cookie notice or cookie settings.

### **14. Third-Party Websites**

Our website may contain links to third-party websites, services or applications.

If you follow a link to an external website, that website will have its own privacy policy and data protection practices. We are not responsible for the privacy practices or content of third-party websites.

We recommend that you review the privacy notice of any external website you visit.

### **15. Changes to This Privacy Notice**

We may update this Privacy Notice from time to time to reflect changes in our business operations, the personal information we collect, the way we process it or changes in data protection legislation.

Any updated version will be published on our website, and the date at the top of the notice will be amended to reflect the latest revision.

We encourage customers and holiday-home owners to review this notice periodically to remain informed about how we handle their personal information.

### **16. Queries, Requests or Complaints**

If you have any questions about this Privacy Notice, how we process your personal information or wish to exercise your data protection rights, please contact us in the first instance.

Sandwich Leisure Holiday Park Woodnesborough Road Sandwich, Kent CT13 0AA

Telephone: 01304 612681 Email: [info@sandwichleisurepark.co.uk](mailto:info@sandwichleisurepark.co.uk)

If you are unhappy with how we have handled your personal information or believe that we have not complied with data protection legislation, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Information Commissioner's Office (ICO)

Website: [ico.org.uk](https://ico.org.uk)

Telephone: 0303 123 1113

Complaints: Make a complaint to the ICO

You also have the right to seek a judicial remedy where applicable.