

# Broadland Sun Association Ltd

## Privacy Policy



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# Broadland Sun Association Ltd

## Privacy Policy



### 1. Introduction

At Broadland Sun Association we are committed to protecting and respecting your privacy, whilst striving to provide the very best holiday experience for our members and visitors. We work very hard to keep your information safe and we want our business and services to be safe and enjoyable for everyone. We follow strict security procedures on how personal information is stored and used and who sees it to help stop any unauthorised person getting hold of it.

This privacy policy (and any other documents referred to in it) explain in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle your data and keep it safe. Personal data means any information capable of identifying an individual. It does not include anonymised data.

Please read this privacy policy carefully to understand our practices regarding your personal information. We know it may seem like a lot of information, but we want you to be appropriately informed about your rights and how we use your data. We hope the following sections will answer any questions you may have, but if not, please do get in touch (contact details are at the end of this policy).

We may update this notice from time to time. If there is any significant change, we will let you know, but you are welcome to come back and check it whenever you wish.

*You are under no statutory or contractual obligation to provide data to us, for example when making a holiday booking or applying for club membership. However, if you do not provide the necessary information, we may be unable to process your booking, holiday or application.*

*We never collect personal data from children or young people under 18 years old.*

### 2. Who is Broadland Sun Association Ltd?

**Broadland Sun Association Ltd** is a naturist members' club and holiday camping business.

We are **registered as a data processor** with the Information Commissioner's Office and our Data Protection Registration Certificate can be viewed in our Main Office.

We have a legal duty to protect personal information that we collect under applicable privacy legislation, including the

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (the "DPA"), as amended by the Data Use and Access Act 2025 (the "DUAA"), and the
- Privacy and Electronic Communications Regulations 2003 (PECR).

We are the **data controller**, and we are located at

**31 Brickle Road, Stoke Holy Cross, Norwich, NR14 8NG**



### 3. Why do we process personal data?

In order to comply with Data Protection Laws, we must have a lawful basis to process your Personal Data. We use the following lawful reasons to obtain and use your personal data:

#### **a. Consent**

Where you have provided your consent, we will process your personal data for discretionary purposes, specified at the time of collection.

*For example, we may ask you if you would like to receive news or marketing information or if we can use a photograph of you to display on our notice board. When we ask you, we will give you the option to tick a box informing us of your preferences.*

#### **b. To fulfil our contract to you**

In certain circumstances, we can collect and process your personal data to fulfil our contract to you.

*For example, in booking a camping trip or a holiday with us, you enter into a contract with the organisation for the purpose of delivering the product and / or services ordered.*

#### **c. Legal Compliance**

If the law requires us to, we may need to collect and process your data

*For example, we can pass on details of people involved in fraud or other criminal activity affecting Broadland Sun Association to law enforcement.*

#### **d. Legitimate Interest**

In certain situations, we may process your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, and which does not materially impact your rights, freedom or interests.

*For example.*

- *Ensuring our IT network and information security*
- *Indicating possible criminal acts or threats to public safety*
- *Personalising our websites and content to improve your customer experience*
- *Sending you surveys to ensure we understand your experience and to make improvements where necessary.*



#### 4. When do we collect your personal information?

We may collect and use various types of personal information from visitors to our websites and guests who book a holiday with us or from those that join the club as a member or who may visit our campsite to work or provide a service to our business. Some examples of when we collect personal information include:

- When you book a holiday with us
- When you apply for or renew membership of our club
- When you engage with us on social media.
- When you contact us with a query or make a complaint.
- When you ask us to email you about a holiday or service.
- When you agree to marketing emails
- When you book an appointment or attend an event
- When you choose to complete a survey that we send you.
- When you create a user account
- To protect our website
- To manage our user accounts
- When you leave reviews or comment on our services.
- If you fill in any forms e.g. booking an activity
- If an accident or incident takes place
- If you visit our site to carry out work or provide a service on site eg contractors or music performers, entertainers
- When contracts are generated with third party service providers eg service contractors, bands and DJs
- When you use our campsite facilities, we have CCTV cameras in operation for the safety and security of both our guests and our members. These systems may record your image during your visit.



## 5. What types of data do we collect?

We process a range of data collected from you. These include:

### **Personal data**

- Your name, address, contact details, including email address and telephone numbers, and vehicle registration details.
- Your gender and date of birth.
- Names and contact details relating to other members of your party, including your spouse and dependents if relevant.
- Membership numbers.
- Website usage data, including Cookies and IP Addresses.
- Incidents, cases of non-adherence, advice and correspondence, including letters, emails, messages and social media.
- CCTV.
- Pictures, photos and videos (where submitted).

### **High risk personal data**

- Payment Details, including Credit Cards and Direct Debit.
- Passport and driving licence information.

### **Special Category and Criminal Offence Data (see section 9)**

- If relevant, health and disability data may be captured.
- Criminal Offence data – e.g. from DBS check documentation.

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### 6. How and why do we use your personal data?

#### a. Customer Data

Type of data	Processing the data	Lawful grounds
We collect customer personal data e.g. name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details relating to any purchases of goods and/or services (including membership) online or in person.	We process this data to supply the goods and/or services you have purchased, to process payments and to prevent fraudulent transactions.	For the performance of a contract between you and us and/or taking steps at your request to enter into such a contract. If we don't collect your personal data during checkout, we won't be able to process your booking, fulfil our contract with you and comply with our legal obligations. Processing payments and prevention of fraud is part of our legitimate business interests.

#### b. Communication Data

Type of data	Processing the data	Lawful grounds
We collect any communication data that you send to us e.g. through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.	We process this data for the purposes of communicating with you, to keep records, to establish, pursue or defend legal claims and to respond appropriately to your queries, refund requests and complaints. We may keep a record of communication to inform any future communication with us and to demonstrate how we communicate with you throughout.	Our lawful grounds for this processing are based on our contractual obligation to you, our legal obligations and our legitimate interests in providing you with the best service – including understanding how we can improve our services based on your experience.

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### c. User Data

Type of data	Processing the data	Lawful grounds
We collect data when you use our website and any online services together with any data that you post for publication on our website or through other online services. E.g. <i>by checking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent logins from unexpected locations</i>	We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website and to protect our business from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard members' accounts. We may also monitor your browsing activity to quickly identify and resolve any problems and protect the integrity of our websites	Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Note: We do not carry out automated decision making or any type of automated profiling.

### d. Technical Data

Type of data	Processing the data	Lawful grounds
Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system.	We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and to understand the effectiveness of our online marketing.	Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.



## 7. Contacting you

We may use information we have collected to contact you directly for the following reasons:

- To send you communications required by law or which are necessary to inform you about the services purchased and changes to the services we provide you from time to time. For example, updates to this Privacy Policy, our Terms and Conditions and information relating to your bookings or other services. We will do this to comply with our legal obligations.
- To send you surveys and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent. We have a legitimate interest to do so as this helps make our products or services more relevant to you.
- To send members information related to membership and club business. The legal basis for this collection is consent by you when making a membership application.

## 8. Disclosure of personal data

We do not routinely share your data with 3<sup>rd</sup> parties.

However, under the following circumstances we may be required to disclose your personal data:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.





## 9. Sensitive personal data

Special category data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We collect and process some sensitive personal information as follows:

### **a. Special requests**

If you make us aware of any special requests for your booking including anything due to specific medical, dietary or religious requirements, we will note these so that we can do our best to meet your request. We will not process this data for any other purpose.

The legal basis for our use of this data is your consent and to fulfil our contract with you. You have the right to object to us processing this data at any time and our right to process data is not overridden by your interests, fundamental rights and freedoms.

### **b. DBS checks**

We require a basic DBS check as part of the application process for membership of our club. We process this information as an identity check and to ensure that our members and visitors are safeguarded. A copy of this document is kept during the membership process for a limited time period and then destroyed upon completion of the process. Access to this information is limited to those who need to make a decision. It can only be used for the specific purpose it was collected ie to verify identity and safeguarding checks.

The legal basis for using this data is your consent during the application process and legitimate business interests.



## 10. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**Contact [secretary@broadlandsun.co.uk](mailto:secretary@broadlandsun.co.uk) for further information about our personal data retention policy.**

## 11. Data security and access

We are committed to protecting your personal data and your privacy by ensuring your personal data is securely processed and stored. The personal information that we collect from our website visitors, guests and members is stored within our secure password-protected IT systems. Some limited paper documents are stored securely in locked facilities.

Access to and use of your data is restricted and only on the legitimate bases detailed in this document ([see section 6](#)). Only authorised individuals within the business have legitimate reason to access and use your personal data and they are required to treat all personal information confidentially. Authorised individuals are:

- Directors (officers and members of the committee)
- IT/website and system administrator (as required for the maintenance and update of our IT systems)
- Warden (read only/limited editing access to essential information for the administration of holiday business)
- Business accountant and book keeper (as required to carry out the financial management of the club)



## 12. Campsite security measures

The following are operated at our campsite to assist with monitoring & maintaining safety, to prevent & detect crime & assist law enforcement (where necessary):

1. CCTV
  2. Identity verification
- We operate a CCTV system on our campsite and premises which record images (but not sound) for security.
  - To ensure that our campsite remains safe and enjoyable for all our members and guests, we conduct identity checks before accepting membership and visits. We require two forms of ID to include confirmation of address. Under certain circumstances additional ID is required eg a BN membership card. Prospective members are also required to provide a basic DBS check.
  - We process this data to protect our customers, premises and assets from crime, and to ensure health and safety at all times. If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
  - Our lawful ground for this processing is our legitimate business interests, and our customers consent to providing this information by agreeing terms and conditions/making a booking or signing an application form for membership.

Contact **[secretary@broadlandsun.co.uk](mailto:secretary@broadlandsun.co.uk)** for further information about our CCTV policy.

## 13. Cookies and other tracking technology

Our website uses “cookies” and other tracking technologies which are placed and stored on your computers’ hard drives, or in their browser memories, if you agree, when you visit our website. These are used for various purposes, including distinguishing you from other website visitors. You can manage all cookies using your browser settings or using a service such as <https://www.aboutcookies.org.uk/managing-cookies>. See our **Cookies Policy on our website** for more information.

## 14. Changes to our privacy policy

We reserve the right to modify this privacy policy from time to time. Any changes we make in the future will be posted on our website. You should check back frequently to see any updates or changes to our privacy policy.



## 15. Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful grounds of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [secretary@broadlandsun.co.uk](mailto:secretary@broadlandsun.co.uk)

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

For more information on your rights, how to exercise these and when they apply, please see: <https://ico.org.uk/your-data-matters/>

## 16. Any questions?

We hope this Privacy Policy has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact us:

- Use the contact form on our website
- Email us [secretary@broadlandsun.co.uk](mailto:secretary@broadlandsun.co.uk)
- In writing to our postal address in an envelope marked 'Data Protection'

We will be pleased to answer any questions, concerns, comments, requests or complaints regarding this privacy policy, our website and/or our use of your personal information