



CUSTOMER PRIVACY POLICY

Welcome to the Privacy Policy of Westmorland Limited and The Rheged Centre, Westmorland Hotel, Gloucester Services, Cairn Lodge Services, and Tebay Services. We are committed to preserving the privacy, integrity and security of the personal information we hold about our customers and those who make contact with us. We have developed this Privacy Policy to explain how we manage and use this personal information and to ensure we comply with our legal obligations under applicable data protection laws. It is important that you read this privacy policy carefully so that you are fully aware of how we collect and process personal information.

WESTMORLAND LIMITED. WHO WE ARE

This Privacy Policy covers the personal information collected and held by WESTMORLAND LIMITED. Westmorland Limited is the collective term we use for a number of different legal entities all of which are involved in the business carried on by Westmorland Limited (see our website at <http://www.westmorlandfamily.com/>)

THE CONTROLLER OF YOUR PERSONAL INFORMATION

Under applicable data protection laws, we are required to advise you who the controller of your personal information is. The controller of the personal information covered by this Policy is Westmorland Limited, Westmorland Family Office, Rheged, Redhills, Penrith, Cumbria CA11 0DQ. Further contact details can be found in the CONTACT US section of this policy.

TERMINOLOGY USED IN THIS POLICY

A “customer” is someone who makes a booking, or stays, or uses any of the services, at one of our motorway services areas, hotel or event venue, or is a member of one of our loyalty programmes.

A “contact” is someone who makes an enquiry, or contacts us, on our website or in person or by letter, phone, email or text, enters into a competition run by us or use wi-fi services offered at one of our properties or facilities but is not a customer of ours.

“we” “us” and “our” refer to Westmorland Limited and, where relevant, other companies in the Westmorland Limited group of businesses. “you” and “your” refer to our customers and contacts.

PERSONAL INFORMATION WE COLLECT AND HOLD AND THE PURPOSE FOR WHICH WE USE IT

This Privacy Policy applies to all personal information collected by Westmorland Limited, by whatever means, both about its customers and about its contacts. The first section below applies to customers and explains under 4 separate headings what personal information we collect about customers, how we collect it, what we use it for and the legal basis on which we rely to do so.



WHAT PERSONAL INFORMATION DO WE COLLECT FROM OUR CUSTOMERS

The personal information we collect may include:-

- (i) name, email address, home and/or business address, phone number;
- (ii) date of birth;
- (iii) booking history;
- (iv) transactional data including details about payments to and from you and other details of products and services you have purchased from us;
- (v) information relating to your use of our services, such as room preferences, special requests, feedback and survey responses;
- (vi) marketing preferences.
- (vii) your IP address through the use of cookies
- (viii) the browser and device which you use to connect with our services

HOW IS OUR CUSTOMER'S PERSONAL DATA COLLECTED?

We will collect this data from you when you provide it to us by phone, email, post, loyalty cards, feedback cards, through our website, through our onsite wifi provider, or in person.

LEGAL BASIS FOR PROCESSING OUR CUSTOMERS' INFORMATION

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:-

- (i) it is necessary for the performance of a contract between us for the provision of services or in order to take steps at your request prior to entering into such a contract; and/or
- (ii) it is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

Occasionally we may also rely upon the following legal bases for processing:-

- (i) you have given your consent to the processing; and/or
- (ii) it is necessary for us to comply with a legal obligation on us; and/or
- (iii) it is necessary to protect your vital interests or those of another individual. Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us using the contact details set out under "HOW TO CONTACT US" below or by emailing data.protection@westmorlandfamily.com



WHAT DO WE USE OUR CUSTOMERS' PERSONAL INFORMATION FOR?

We intend to use your personal information for the following purposes:-

- (i) to fulfil your bookings and/or to provide services or facilities you request from us;
- (ii) to collect payment from you;
- (iii) to administer and manage our relationship with you, which may include asking you to complete surveys or feedback forms;
- (iv) where you have made a reservation with us, to send you information before your visit to confirm the reservation and to provide you with other information relating to your reservation which we think you may find of interest;
- (v) to send you information relating to the loyalty club (if you are a member) (such as loyalty club redemptions and vouchers) and relating to your membership of our clubs (if you are a member);
- (vi) to send you marketing and promotional material where we think this may be of interest to you if you have provided us permission to do so
- (vii) to display relevant and targeted online advertising based on your browsing history on our website and social media activity based on your cookie data
- (viii) to improve our websites and online content based on our customers online activity on our website
- (viii) where required by law

HOW WE USE COOKIE DATA

We collect information about how you use our websites and access our social media content by using a cookie. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. It may also show you adverts on other websites relating to what you have viewed or bought from our websites.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We also use this information to understand what you have viewed on our website, so we can send you relevant marketing for through direct email marketing and social media channels.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us through Cookies, which is your IP address. An IP address is a unique code that relates to the device you are using to browse the internet, which simply identifies you as an individual user on the internet, and



can track what you view and for how long. We cannot connect it with any other personally identifiable information, such as your name, address, date of birth etc.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We only use cookie data for marketing purposes from the last 90 days. When someone visits our websites we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

HOW LONG DO YOU KEEP MY DATA FOR?

We will only retain your personal information 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. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data: see under **YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION AND YOUR OTHER RIGHTS**/to request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. We will take all reasonable steps to destroy, or erase from our systems, all the personal information we hold about you when it is no longer required.

For Marketing Purposes, we will ask you by email to reconfirm your permission for us to contact you by email for marketing purposes, every 12 months from the date you provided us permission. You are able to unsubscribe from our emails by clicking the unsubscribe link in any email you receive from us. You can re-join the mailing list at any time by visiting our contact us page.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION REQUESTED

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, 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 services). In this case, we may have to cancel a service you have booked with us but we will notify you if this is the case at the time.



SHARING YOUR PERSONAL INFORMATION WITH OTHERS

We will not disclose personal information we hold about you to any third party except where required by law or as follows: -(i) to companies within the Westmorland Family Group;(ii) to third parties who provide services to us, and act as data processors for us;(iii) to professional advisers including lawyers, bankers, auditors and insurers;(iv) to HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances. Also in the event that we sell any business or assets, we may disclose personal information we hold about you to the prospective and actual buyer of such business or assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy. Please note that we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EEA

We do not intend to transfer any personal data we hold about you to a country outside the European Economic Area (“EEA”). If however we do transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards applies:

- the countries to which it is transferred have been deemed to provide an adequate level of protection for personal data by the relevant regulators;
- we have put in place with the transferee specific contracts approved by the relevant regulators which give personal data similar protection to that it has in Europe; or
- if the transferee is in the US, it is registered with the Privacy Shield (or any similar replacement scheme) which requires it to provide similar protection to personal data as is required in Europe.

DATA SECURITY

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 need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION AND YOUR OTHER RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- to request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;



- to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. It also enables you to request that we 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;
- to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- to request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- to request transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; or
- to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by using the contact details set out below under "HOW TO CONTACT US" below or by emailing data.protection@westmorlandfamily.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If you wish to exercise any of those rights we may need to request specific information from you to help us confirm your identity. 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 and keep you updated.

MANAGING YOUR PERSONAL INFORMATION

If at any time you believe that any personal data we are holding about you is inaccurate, out-of-date or incomplete, please tell us by emailing us at data.protection@westmorlandfamily.com and we will rectify this.



CHANGES TO THIS POLICY

We may need to make changes to this Privacy Policy from time to time to take account of changes in law or the needs of our business. Please refer back to this page regularly to see any changes or updates to this Policy. This Policy was last updated on 25 May 2018.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

HOW TO CONTACT US

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:-

By Post

Data Protection Department

Westmorland Limited

Westmorland Family Office

Rheged

Redhills

Penrith

CA11 0DQ

Tel: 015396 24511

By Email data.protection@westmorlandfamily.com

COMPLAINTS

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection laws you have the right to lodge a complaint at the Information Commissioner's Office (ICO) (<https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



SOCIAL MEDIA COMPETITIONS

1. The promoter is: Westmorland Ltd (Company no 53 578 57) whose registered office is at Westmorland Family Office, Rheged, Redhills, Penrith, Cumbria CA11 0DQ.
2. Employees of Westmorland Ltd. or their family members or anyone else connected in any way with the competition or helping to set up the competition shall not be permitted to enter the competition.
3. There is no entry fee and no purchase necessary to enter our competitions.
5. Closing date for entry are stated on the competition post. After this date the no further entries to the competition will be permitted.
6. No responsibility can be accepted for entries not received for whatever reason.
8. The promoter reserves the right to cancel or amend the competition and these terms and conditions without notice in the event of a catastrophe, war, civil or military disturbance, act of God or any actual or anticipated breach of any applicable law or regulation or any other event outside of the promoter's control. Any changes to the competition will be notified to entrants as soon as possible by the promoter.
9. The promoter is not responsible for inaccurate prize details supplied to any entrant by any third party connected with this competition.
10. No cash alternative to the prizes will be offered. The prizes are not transferable. Prizes are subject to availability and we reserve the right to substitute any prize with another of equivalent value without giving notice.
11. Winners will be chosen at random unless otherwise stated.
12. The winner will be notified by email or social media messaging within 28 days of the closing date. If the winner cannot be contacted or do not claim the prize within 14 days of notification, we reserve the right to withdraw the prize from the winner and pick a replacement winner.
13. The promoter will notify the winner when and where the prize can be collected.



14. The promoter's decision in respect of all matters to do with the competition will be final and no correspondence will be entered into.

15. By entering this competition, an entrant is indicating his/her agreement to be bound by these terms and conditions.

16. The competition and these terms and conditions will be governed by English law and any disputes will be subject to the exclusive jurisdiction of the courts of England.

17. The winner agrees to the use of his/her name and image in any publicity material. Any personal data relating to the winner or any other entrants will be used solely in accordance with current UK data protection legislation and will not be disclosed to a third party without the entrant's prior consent.

18. The winner's name will be available 28 days after closing date by sending a stamped addressed envelope to the following address: Westmorland Limited, Westmorland Family Office, Rheged, Redhills, Penrith, Cumbria CA11 0DQ.

19. Entry into the competition will be deemed as acceptance of these terms and conditions.

20. This promotion is in no way sponsored, endorsed or administered by, or associated with, Facebook, Twitter or any other Social Network. You are providing your information to Westmorland Ltd. and not to any other party.

21. This competition is in no way sponsored, endorsed, administered by, or associated with the Prize Provider, as stated on the social media post.

22. Any images shared on social media channels are owned by the platform provider. By entering the competition you give us the right to use the image for marketing purposes.