PRIVACY POLICY

This Policy applies as between you, the User of this Website and Kovereki Ltd (trading as My Caravanspace) the owner and provider of this Website, (hereafter referred to as "MYCS"), This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. DEFINITIONS AND INTERPRETATION

In this Policy the following terms shall have the following meanings:

"Data"	means collectively all information that you submit to MYCS via the Website. This definition incorporates the definitions provided in the General Data Protection Regulation "GDPR" and the Data Protection Act 2018.
"Cookie"	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out below in Clause 11.
"My caravanspace"	means MYCS (trading name), operating under limited company Kovereki Limited, registered office Ellismuir House, Ellismuir Way, Tannochside Business Park, Glasgow.
"UK and EU Cookie Law"	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 and incorporated into the "GDPR"
"User"	means any third party that accesses the Website that is not employed by MYCS.
"Website"	means the website that you are currently using (www.mycaravanspace.com) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. SCOPE OF THIS POLICY

This Policy applies only to the actions of MYCS and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3. YOUR PERSONAL DATA - WHAT IS IT?

Personal data relates to a living individual (data subject) who can be identified from that Data. Identification can be by the information alone or in conjunction with any other information in MYCS's possession or likely to come into such possession. The processing of personal Data is governed by the General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018.

4. HOW DO WE PROCESS YOUR PERSONAL DATA?

MYCS is the data controller. This means MYCS decides how your personal data is processed and for what purposes.

MYCS complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To enable MYCS to provide services to your business to fulfil a contract(s) made between you or your company and MYCS;
- To keep you up to date with MYCS news, promotions and events if you have consented to this;
- To send you information about MYCS products and services if you have consented to this;
- To conduct MYCS market research if you have consented to this, which may be done using email, telephone or mail. Such information may be used to customise or update the Website.
- To track usage of our website through the use of Google Analytics;
- To manage our employees;
- To maintain our own accounts and records.

Any personal Data you submit will be retained by MYCS for a period of 24 months. If we hold your details based on your consent, we review data annually and records that are older than 24 months from when you provided your consent may be destroyed.

Unless we are obliged or permitted by law to do so, save for Clause 7, your Data will not be disclosed to third parties. This includes our affiliates.

All personal Data is stored securely in accordance with the principles of the GDPR and the Data Protection Act 2018.

5. WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

- Explicit consent of the Data subject so that we can keep you informed about MYCS news, promotions and events;
- Explicit consent of the Data subject so that we can keep you informed about MYCS products and services;
- Processing is necessary to fulfil a contract made between you (as a customer of our services and/or products) and MYCS;
- Processing is necessary for carrying out legal obligations in relation to employment, social security or social protection law, or a collective agreement.

6. WHAT DATA IS COLLECTED?

Without limitation, any of the following Data may be collected by this Website from time to time:

- name;
- date of birth;
- contact information such as email addresses and telephone numbers;
- demographic information such as post code, preferences and interests;
- financial information such as credit / debit card numbers;

- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected);
- a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected)

7. SHARING YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential.

It may be shared with selected data processors in order to fulfil the legal basis for processing, examples of which are:

- data processors required to fulfil a contract;
- data processors who fulfil e-mail marketing activity for MYCS;
- and data processors who provide payroll services.

Any Data used by such data processors may only be used by to the extent required to perform the services that MYCS requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the GDPR and Data Protection Act 2018.

All data processors are subject to confidentiality and we will not share your data with other third parties which are outside of the scope of the documented legal basis for processing.

8. YOUR RIGHTS AND YOUR PERSONAL DATA

Unless subject to an exemption under the GDPR or any other corporate compliance or legal requirement, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which MYCS holds about you;
- The right to request that MYCS corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for MYCS to retain such data;
- The right to withdraw your consent at any time;
- The right to request that MYCS provides the data subject with their personal data in a commonly used electronic format;
- The right to lodge a complaint with the Information Commissioners Office.

You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

- Use of Data for direct marketing purposes; and
- Sharing Data with third parties.

9. LINKS TO OTHER WEBSITES

This Website may, from time to time, provide links to other websites. MYCS has no control over such websites and is in no way responsible for their content. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

10. SECURITY

Data security is of great importance to MYCS and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

11. COOKIES

Like many other websites, we use "Cookies" to help us gather and store information about visitors to our websites. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

A Cookie is a text-only string of information that a website transfers to the Cookie file of the browser on your computer's hard disk so that the website can remember who you are. A Cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the Cookie, and a value, usually a randomly generated unique number.

MYCS uses Cookies to improve your experience of using the Website and to improve our range of products and/or services. MYCS has carefully chosen these Cookies and has taken steps to ensure that your privacy is always protected and respected.

By using this Website you may receive certain third-party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than MYCS. Third party cookies are used on this Website for payment processes and site analytics and are detailed below.

Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be "strictly necessary". Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser's settings as detailed further below.

Aside from those Cookies deemed "strictly necessary" (as described above), before Cookies are placed on your computer, you will be presented with an alert bar on entry to the site requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling MYCS to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

We use the following types of cookies on our site;

- Preference Cookie At your request we may place a cookie to remember your preferences so that you do not need to re-enter your details (country/age and language preferences) on our gateway page. This is not suitable if you share your computer with someone else.
- Social Sharing This is a cookie that identifies you with social networking sites such as Facebook and Twitter and allows interaction between your activity on social networking sites and on our website through your direction and makes your transition between the sites more seamless.
- Content Management cookies These are cookies required for the content management system that our web site is based on to work.
- Template preference cookies These cookies are necessary for mobile sites to enable the site to look and feel the way it is intended to.
- Site Analytics We use Google Analytics to help analyse use of our website. The information used by Google Analytics is collected in an anonymous form and stored by Google for 26 months, enabling us to perform year on year comparisons. For more information about Google Analytics please visit https://support.google.com/analytics/answer/6004245?hl=en-GB

The following is a list of cookies that may be placed on your computer:

Provider	
Weecommerce	Persistent 30 day cookie
Google	Google analytic tracking cookie

Please note that some Joomla plugins may use cookies to assist with the functionality of www.mycaravanspace.com. These may not be listed above.

You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our service to you.

You may remove Cookies and prevent future use of them by following the steps set out below.

- You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.
- You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

12. FURTHER PROCESSING

We will not use your personal data for any task other than those listed here. Should a new unforeseen requirement arise in the future then this policy will be updated and where the MYCS basis for processing is based on consent, we will ask you for a new consent which covers the new requirement before processing your details for this new requirement.

13. CONTACT DETAILS

To exercise all relevant rights, queries or complaints in the first instance please contact MYCS <u>info@mycaravanspace.com</u>. Alternatively, you can contact the Information Commissioners Office on 0303 123 1113 or via <u>email</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.