

## Introduction and contents

This is the privacy policy for Parkstock Limited (“ Rowans”), our site [www.rowans.co.uk](http://www.rowans.co.uk) (“our sites”), and our associated apps.

Our values guide everything that we do – including our customer service approach and how we use personal data. We are strongly committed to keeping your personal data safe. This commitment exists throughout the lifecycle of your personal data, from the initiation and design of any Rowans service which uses personal data to the deletion of that data.

We think carefully about our use of personal data, and below you can find the details of what we do to protect your privacy. This policy covers, among other topics:

- Information about your rights, the choices available to you, and our obligations in the European Union & UK
- Transparency about how we collect and use your personal data, including when and how it is shared
- Information on how we protect your personal data
- Information on how we will facilitate your rights and respond to your questions

Find out more about how we manage your personal data below.

## About this privacy policy

This privacy policy explains how we collect, use, share and transfer your personal data when you use the services provided on our sites and our apps or interact with us; and your data privacy rights.

Personal data is any information about you by which you can be identified or be identifiable. This can include information such as:

- your name, date of birth, email address, postal address, phone number, mobile number and financial details such as payment cards you use to purchase products and services.
- information about your device (such as the IP address, which is a numerical code to identify your device that can provide information about the country, region or city where you are based)
- information relating to how you use and interact with our sites, apps and services

Sometimes our sites and apps may contain links to sites and services that are not part of the Rowans family of offerings. These sites and services have their own privacy policies. If you follow a link to these non-Rowans sites and apps, you should read and ensure you understand the privacy policies shown on those sites and apps.

## Who we are and how to contact us

Parkstock Limited t/a Rowans, 255 Green Lanes, London, N13 4XE is the data controller in respect of your personal data. This means that we are responsible for deciding how and why we hold and use your personal data. If you want to contact us directly, you can find our contact details in the “How to contact us” section below.

## The types of personal data we collect about you

We collect your personal data when you visit our sites or apps, use our products or services, contribute to Rowans social media accounts or when you interact with us. We will only collect your personal data in line with applicable laws. We collect your personal data in various ways:

- directly from you, when you use our services and when you browse our sites or use our apps
- personal data we generate about you, e.g. personal data we use to authenticate you, or personal data in the form of your IP address or your preferences
- personal data we may collect from third parties, e.g. personal data that helps us to combat crime or which we collect, with your permission, when you interact with our social media accounts.

More detail about these three categories of personal data are provided below.

### ***The personal data we collect when you make a booking with Rowans***

When you make a booking with Rowans via [www.rowans.co.uk](http://www.rowans.co.uk) we collect:

- your name
- your email address
- your phone numbers

The personal data provided above is processed by an authorised data processor who provides us with your personal data upon confirmation of the booking.

### ***Personal data we generate about you***

When you use our sites or apps we may also use cookies or similar technology to collect extra data, including:

- your IP address - a numerical code to identify your device, together with the country, region or city where you are based
- your geolocation data - your IP address can be used to find information about the latitude, longitude, altitude of your device, its direction of travel, your GPS data and data about connection with local Wi-Fi equipment
- information on how you interact with our services
- your browsing history of the content you have visited on our sites, including how you were referred to our sites via other websites

- details of your computer, mobile, TV, tablet or other devices, for example, the unique device ID, unique vendor or advertising ID and browsers used to access our content

We will not collect special categories of data from you - such as personal data concerning your race, political opinions, religion, health or sexual orientation - unless you have chosen to provide that type of personal data to us.

### ***Personal data when you post comments about the Rowans on other social media sites***

If you have mentioned the Rowans in posts on social media sites, then we may collect your social media handles. For example, when you mention the Rowans in a tweet, we may collect your Twitter handle.

*When you post publicly (comments) on our sites*

Any personal data posted on a discussion board or used to comment publicly on an article on one of our sites is publicly accessible and may be processed by Rowans or any other person with access to this content.

## **How we collect personal data**

We collect personal data when you:

- use [www.rowans.co.uk](http://www.rowans.co.uk) to make a booking.
- enter our competitions and surveys
- sign up for marketing communications
- use mobile devices to access our websites and apps
- access and interact with any of our websites and apps
- through cookies and other similar technology
- when you contact us via email, social media, our apps or similar technologies or when you mention us on social media
- issue a complaint against us

## **How we use your personal data**

We use personal data collected through our sites and apps only when we have a valid reason and the legal grounds to do so. We determine the legal grounds based on the purposes for which we have collected your personal data.

### ***Legal grounds for using your personal data***

The legal ground may be one of the following:

- **Consent:** Often we will use your personal data because we have asked for your consent, which you can withdraw at any time. Examples of where we ask for your consent include:
  1. to send marketing emails to you, when we have asked your permission. You can withdraw your consent to receiving these emails at any time.

2. to place non-essential cookies, or other similar technologies on your device(s). We provide more details of how we use cookies in our cookie policy. You can withdraw your consent to us placing these cookies at any time through our Privacy Settings.
- *Performance of a contract with you (or in order to take steps prior to entering into a contract with you):* We will use your personal data if we need to in order to perform a contract with you. For example, where you have a booking with us, we will need to use your contact details and payment data in order to process your order and deliver your booking.
  - *Compliance with law:* In some cases, we may have a legal obligation to use or keep your personal data.
  - *Our legitimate interests:* We may process your personal data where it is necessary for our legitimate interests in a way that might be expected as part of running Rowans and in a way which does not materially impact your rights and freedoms. Examples of when we rely on our legitimate interests to use your personal data include:
    - when we analyse what content has been viewed on our sites and apps, so that we can understand how they are used and improve our services.
    - to keep you informed about Rowans if you have patronised or supported us in the past, and have not opted out from receiving our communications also known as the soft opt in.
    - for internal administrative purposes related to our services - such as our accounting and records.
    - to inform you of any changes to our services, such as updates to our terms and conditions.
    - enabling you to share our content with others using social media or email.
    - contacting you directly via social media or email if you send us emails, enter competitions or engage with the Rowans on social media or contact us.
    - when we respond to your queries and to resolve complaints.
    - for security and fraud prevention, and to ensure that our sites and apps are safe and secure and used in line with our terms of use.

Where we rely on cookies to collect any personal data please see our Cookie Policy for more information and how to manage your cookie choices through your Privacy settings.

***Access permissions when you are using the Rowans app***

When you use the Rowans app, we will ask for permissions to access particular functions of your mobile device. When we ask for permissions will depend on the operating system of your mobile device, but can include:

- when you decide to store content including photographs on your mobile device to read or use when offline. We will need your permission to save content to your mobile device.
- asking permission to access your contact details/profile on your mobile device, so that we can add or find your Rowans account on your phone;
- if you decide to submit content, such as photographs, to the Rowans we will ask permission to access your camera or photographs.

## **Security of your personal data**

Sending any information, including personal data, via the internet is not completely secure. Although we will do our best to protect your personal data once with us, we cannot guarantee the security of any personal data sent to our site while still in transit and so you provide it at your own risk.

## **When we share or sell your personal data**

*With external organisations*

We share your personal data with other organisations that are not directly linked to us under the following circumstances:

*Service providers* - We may share your data with other organisations that provide services on our behalf. We may do this to perform a contract we have entered into with you, where it is in our legitimate interests or with your consent. Examples of when we may share your data with service providers include sharing with:

- online payments processors who process credit and debit card transactions on our behalf

*Agencies and authorities if required by law* - We may reveal your personal data to any law enforcement agency, court, regulator, government authority, or in connection with any legal action if we are required to do so to meet a legal or regulatory obligation, where the request is proportionate, or otherwise to protect our rights or the rights of anyone else (for example, in response to valid and properly served legal process such as subpoena or warrant). If we have your contact details, we will take reasonable steps to attempt to notify you prior to disclosing your data unless (i) prohibited by applicable law from doing so, or (ii) there are clear indications of unlawful conduct.

*Social media organisations* - We may share your personal data with other organisations when our web pages use social plug-ins from these organisations (such as the “Facebook Recommend” function, Twitter’s retweet function, Google+ function). These other organisations may receive and use personal data about your visit to our sites or apps. If you browse our site or view content on our apps, personal data they collect may be connected to your account on their site. For more information on how these organisations use personal data, please read their privacy policies.

*Organisation/s that buy any of the Rowans group companies* - We may share your personal data to any other organisation that buys, or to which we transfer all, or substantially all, of our assets and business. If this sale or transfer takes place, we will use reasonable efforts to try to make sure that the organisation we transfer your personal data to uses it in line with our privacy policy.

Any organisations which access your data in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your data and keep to all data privacy laws that apply. We may also independently audit these service providers to make sure that they meet our standards.

## **How long we keep your personal data**

We keep your personal data for only as long as we need to. How long we need your personal data depends on what we are using it for, as set out in this privacy policy. For example, we may need to use it to answer your queries about a product or service and as a result may keep personal data while you are still using our product or services. We may also need to keep your personal data for accounting purposes, for example, where you have made a booking. If we no longer need your data, we will delete it or make it anonymous by removing all details that identify you. If we have asked for your permission to process your personal data and we have no other lawful grounds to continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing in future.

## **How we may contact you**

*Marketing communications and editorial newsletters*

If we have your permission or you have not opted out, we may send you materials we think may interest you, such as new Rowans offers and updates. Depending on your marketing preferences, this may be by email, phone, SMS or post.

You can decide not to receive these emails at any time and will be able to “unsubscribe” directly by clicking a link in the email or through your email preferences in the tab “emails and marketing”.

## **Cookies and similar technologies**

When you visit our sites or when you use our apps, we may collect personal data from you automatically using cookies or similar technologies.

This privacy policy includes our cookie policy, where you can find more information about our use of cookies.

## Your privacy and data protection rights with regard to the personal data that we hold about you

You have a number of rights with regard to the personal data that we hold about you and you can contact us with regard to the following rights in relation to your personal data:

- You have the right to receive a copy of the personal data we hold about you
- You have the right to correct the personal data we hold about you
- Where applicable, you may also have a right to receive a machine-readable copy of your personal data
- You also have the right to ask us to delete your personal data or restrict how it is used. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request
- Where applicable, you have the right to object to processing of your personal data for certain purposes
- Where you have provided us with consent to use your personal data, you can withdraw this at any time

If you would like to exercise any of your rights specified above, please email [info@rowans.co.uk](mailto:info@rowans.co.uk) and all requests will be responded to within one month.

We may need to request specific information from you to help us confirm your identity. If your request is complicated or if you have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of 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.

## Contact us for information about how we use your personal data

If you have any questions about how we use your personal data or if you have a concern about how your personal data is used, please contact the Data Protection Officer at Parkstock Limited t/a Rowans by emailing [info@rowans.co.uk](mailto:info@rowans.co.uk)

Complaints will be dealt with by the Data Protection Team and will be responded to within one calendar month.

If you are not satisfied with the way your concern has been handled, you can refer your complaint to the [Information Commissioner's Office](#).

If you have a question about anything else, please send an email to [info@rowans.co.uk](mailto:info@rowans.co.uk)

## **Changes to this privacy policy**

If we decide to change our privacy policy we will post the changes here. If the changes are significant, we may also choose to email all our registered users with the new details. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your data.

### ***Changes to this privacy policy to date***

The most recent changes to this privacy policy were made on:

- 1 March 2023