



## Subcontractor Privacy Policy

### Purpose of this policy

Please read this privacy policy carefully as it sets out how (“Center Parcs”, “We”, or “Us”) use and process personal information relating to you, as a subcontractor of Center Parcs.

For the purposes of this privacy policy the data controllers within the Center Parcs group are listed in section 11. The Center Parcs Group.

If you have any questions about this policy, please contact us by email as follows:

- For United Kingdom residents at [data.protection@centerparcs.co.uk](mailto:data.protection@centerparcs.co.uk); or
- For residents of the Republic of Ireland and the rest of the European Union (EU) at [data.protection@centerparcs.ie](mailto:data.protection@centerparcs.ie).

Please note this policy applies to subcontractors who are external to Center Parcs and does not form part of any contract. This Contractor Privacy Notice is for any individual whose personal data we process and who falls under the following categories:

- Contractors engaged to provide services e.g., sole traders, and individuals providing services via limited companies
- Suppliers
- Individuals engaged by outsourced services providers e.g. cleaning/security/activity providers etc
- Agency workers

We may update this privacy policy at any time. You are advised to refer to this policy from time to time to ensure that you are familiar with the current version.

### Information that We Collect

In order to manage our relationship with you, we will need to process your personal information. Personal information we will process about you includes: -

- Name
- Company name
- Company address
- Job title
- Work contact telephone number
- Work email address
- Vehicle registration and vehicle details (if required)
- Photo (if required)
- Times in and out of the building
- CCTV footage



- Certificates and qualifications
- Accreditation and membership numbers
- Insurance details and certificates
- Accident health/ injury information (if applicable)
- Bank details (if applicable)
- Credit and sanction information
- Director bankruptcy checks
- References (if applicable)
- Dietary information (if applicable)
- Health/ disability information (if applicable)

### **Where we collect your personal information from**

We will collect personal information about you when you submit forms to us (whether through our supplier management platform or otherwise) and throughout our relationship with you. If you do not provide all personal information requested, then we may not be able to contract with you or permit access to our villages, sites or offices.

### **The purposes we will process your personal information for**

We will use personal information about you for the following purposes:

- To assess your proposal, quotation and eligibility to provide certain services we may require
- To manage our relationship with you
- To check that you have the necessary accreditations and insurance to carry out the work required
- For record keeping purposes
- To maintain logs of who is onsite
- To ensure that the site is safe and secure for all persons visiting
- To manage any health and safety incidents that occur
- To maintain any records required by law
- To pay you for services performed
- To arrange supplier, trade, vendor events

### **What legal basis do we rely on to process your information?**

Data protection law sets out several lawful bases on which organisations can rely on to lawfully handle personal information. The lawful bases we rely on to process your personal information are: -

#### Legitimate Interests

The law permits us to handle your personal information where necessary in our legitimate interests and where these do not outweigh your interests. Many of the purposes we handle your personal information, described above, fall into this category as they are essential activities which enable us to



run our business efficiently and effectively for example, to assess your suitability to provide the services we need and to keep our records up to date.

#### Performance of a Contract

We will process your personal information to enable us to perform the contractual commitments we make to you. For example, we will process your bank account details so that we can pay your invoices.

#### Required by Law

We will process personal information where necessary to comply with any legal obligation that may apply to us. For example, to comply with health and safety or some other law that applies to us. We may in certain circumstances be required to describe your personal data to for example, a court, law enforcement or HMRC.

### **Who we share your personal information with**

To manage our business effectively we will need to share your personal information with selected third parties. We will not share your personal information unnecessarily and will always ensure that all third parties who process your personal information on our behalf, have entered into an appropriate written contract with us, are required to process it in accordance with our instructions, and have appropriate measures in place to protect it.

The types of third parties we will share your personal information with include:

- Our group (Center Parcs Group)
- Insurers
- Landlords
- Government agencies
- Payment processors
- Credit reference agencies
- Auditors
- IT service providers who help us manage our IT infrastructure including the CCTV systems we use and our supplier management platform.

### **How secure is your information?**

We take your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure, or destruction and have several layers of security measures in place. All the data you provide us is held in our secure data centres which are further encrypted. We continue to review and amend our security practices to ensure we protect your data in this evolving security landscape.



## **International transfers of personal information**

Your data may occasionally be processed and held by third parties outside the United Kingdom (UK) and European Economic Area (EEA). If we do send personal information overseas, we will make sure that appropriate safeguards are in place to ensure it is protected in accordance with European data protection laws. These might include: -

- Sending personal information only to countries that the UK and European Authorities have approved as having adequate data protection laws in place e.g. Canada or Switzerland.
- Entering into a standard form of contract with the recipient which European Authorities and the UK Government have approved as providing adequate protection.

If you want to know more about how we keep your data secure when it is transferred internationally, please contact us using [data.protection@centerparcs.co.uk](mailto:data.protection@centerparcs.co.uk) or at [data.protection@centerparcs.ie](mailto:data.protection@centerparcs.ie) as appropriate.

## **How long do we keep your information?**

We only hold your personal information for the necessary amount of time and for as long as your arrangement with us is current and time thereafter to manage payments unless, there is a requirement to hold that information for a longer period.

Towards the end of our arrangements with you, we may ask for your consent to keep on record your interest in future contracts which may arise with Center Parcs.

We may also retain information for legal defence against potential claims. E.g. If you have had an accident in one of our Villages, then we will hold your information for the duration of any statutory limitation period associated with such legal claims.

As a result, the length of time that we keep your information for will vary depending on the purposes for which we have it. In any event, we will review what information we need on an ongoing basis and will only retain it for the minimum amount of time that we need it for or are legally obliged to keep it for.

To determine the appropriate retention period for personal information, 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.

If you would like more information about how long your personal information will be held for, you can contact us at [data.protection@centerparcs.co.uk](mailto:data.protection@centerparcs.co.uk) or at [data.protection@centerparcs.ie](mailto:data.protection@centerparcs.ie) as appropriate.

## **What are your data protection rights?**



We will try to keep your personal information up to date but rely on you telling us promptly if your name, address, telephone number or any other details change. Equally, if you think any information, we have about you is wrong or incomplete, please let us know by contacting us in the same way.

You also have the right to access your personal information and to receive a copy of it. You can exercise this right by emailing us at [data.protection@centerparcs.co.uk](mailto:data.protection@centerparcs.co.uk) or at [data.protection@centerparcs.ie](mailto:data.protection@centerparcs.ie) as appropriate, or by contacting us at Center Parcs, Legal Department, One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP.

Data protection laws also give you a number of additional rights including the right to object to your personal data being processed, to restrict the processing of your personal information or. to have your personal data erased or transferred either to you or a third party in a commonly structured format and to have your personal information restricted. Please be aware that these latter rights only apply in limited circumstances and therefore even if you wish to exercise them, we may not always be required to comply.

When you exercise an individual right, we may request further information to allow us to verify your identity. This is to ensure that the individual right is been exercised by the correct individual and ensures we continue to protect individual's personal data. In limited circumstances, we may ask you to confirm certain pieces of information which we hold about you or in some cases ask you to provide proof of identification.

For further information about how these rights apply, or to exercise your rights, please contact us on **0344 8267723** or email us at [data.protection@centerparcs.co.uk](mailto:data.protection@centerparcs.co.uk) or at [data.protection@centerparcs.ie](mailto:data.protection@centerparcs.ie) as appropriate.

You also have the right to lodge a complaint with the supervisory authority. To do this, you can contact The Information Commissioner's Office through their website at [www.ico.org.uk](http://www.ico.org.uk), by phone on 0303 123 1113 or in writing to Wycliffe House, Water Lane, Wilmslow, SK9 5AF. In Ireland you can contact The Data Protection Commissioner through their website at [www.dataprotection.ie](http://www.dataprotection.ie), by phone on (01) 7650100 or 1800 437 737 or in writing to Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.

### **The Center Parcs Group**

The companies in the Center Parcs group covered by this privacy policy are listed below. Please note Center Parcs provides spa experiences under the "Aqua Sana" brand, this is a brand and not a separate legal entity:

- Center Parcs Limited, Company number: 01908230, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP
- Center Parcs (Operating Company) Limited, Company number: 04379585, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP.
- CP Woburn (Operating Company) Limited, Company number: 07656412, Registered address: One Edison Rise, New Ollerton, Newark, Nottinghamshire, NG22 9DP.



- Center Parcs Ireland Limited, Company number: 554787, Registered address: 10 Earlsfort Terrace, Dublin 2, D02 T380, Ireland.

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