

Privacy Policy

This Policy applies to Blarney Woollen Mills Ltd and all associated companies as defined in section 2 subsection 6 of the Companies Act 2013 (together "Blarney Group").

The Blarney Group is committed to protecting and respecting your privacy. We adhere to this Privacy Policy (the "Policy") which together with any disclaimers sets out the basis on which any Data ("Data") we collect from you (or that you provide to us, or that is provided to us relating to you) by any means will be processed. Please read the following carefully to understand our use of Data. Please note that the Policy relates only to living individuals in relation to Data relating directly to themselves, and not to persons in any other capacity.

Information we may collect from you

We collect Data from you which you volunteer when you provide such Data to us, or via our services with which you interact. We may also be given other Data relating to you by other persons, or we may obtain such other Data about you as may be provided to us in the course of our legitimate business activities.

We may collect and process Data; including the following in the course of providing services to you, which could contain your Data:

Your full name; your address; your various email addresses; your various phone numbers including mobile phone numbers; your nationality; your address; financial information about you, including your bank account details, credit card details, or other payment details; details of contracts you have entered with third parties for us to provide services to you; details of your relationship to other parties; details of your membership of professional or other organisations; your date of birth; details of your children and other relations; medical details, including details of allergies and other health information; details of your car registration number; details of your driving licence; and details of your passport. We may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments and all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing accommodation, gym, leisure, spa, retail, online shopping or food related services to you.

We may also process other data, which is not personal data.

When you access our website or Wi-Fi facilities, your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you. When you use our Wi-Fi service, you provide your email address and are required to consent to being marketed to by Blarney Group at that email address.

Online Shopping

We may collect Data from users of our online shopping applications in a variety of ways, including, but not limited to, when users visit our site, register on the site, place an order, subscribe to a

newsletter, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our site.

Security and where we store your Data

We are committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your Data for their own purposes. Non EEA countries may not provide an adequate level of protection in relation to processing your Data. By submitting your data, you agree to this transfer, storing and processing.

Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to us. Any transmission of data is at your own risk. Once we receive your Data, we use appropriate security measures to seek to prevent unauthorised access.

Uses made of your Data

We use your Data that we hold to:

- In our legitimate interest of advertising our services, provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes (our list of services below);
- carry out our obligations arising from any contracts entered into between you and us;
- in our legitimate interest of advertising our services, provide details of any loyalty scheme or promotion;
- comply with legislation; and/or
- notify you about changes to our services.

List of services

- Accommodation
- Gym
- Spa
- Leisure
- Retail and online shopping
- Restaurant, bar service and other food related services.

We may use your data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your data in this way, please notify us to that effect, at gdprcompliance@blarney.com

We keep your Data for varying periods according to our Retention Schedule here.

Disclosure of your information

Provider/Recipient	State "EU" or alternatively state jurisdiction to which the Data is transferred
Third parties with whom: (i) we need to share your information to facilitate transactions you have requested, and (ii) you ask us to share your information	EU and Non EU
Service providers who provide us with support services	EU and Non EU
Statutory and regulatory bodies (including central and local government) and law enforcement authorities in order to any applicable laws, grant applications and /or court orders;	EU

Some jurisdictions may not have adequate safeguards for the protection of personal data, and where this is the case we comply with Chapter 5 of the General Data Protection Regulation ("GDPR") to provide an alternative method of safeguarding your personal data.

Miscellaneous

We do not conduct profiling.

Where we process your Data based only on your consent, you may withdraw your consent.

You have the right to bring a complaint to a supervisory authority if you have any complaints about the processing of your Data. In Ireland the Data Protection Commission is the supervisory authority.

In circumstances where the provision of your Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, we will advise you at the point of collecting your Data whether the Data is a required field, and the consequences of not providing the Data.

Where the Data is not provided by you we will set out what the categories of Data are, and where we obtained the Data here.

Payments

We may need to collect the following information, as it is necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations).

- **Payment Information.** When you make payments, we require certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** We may require identity verification information, in order to verify your identity and comply with applicable law.

How we use the payment data collected

- Enable you to pay for our products and services.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce our payment terms.

We process this information in our legitimate interest in providing goods and services and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

Digital Marketing

If you are not a customer, you may still opt to receive communications from us which we consider may be of interest to you, by any of the following methods: newsletter, email, SMS text message, social media and phone calls. You will be asked to opt-in if you wish to receive these. If you wish to

be removed from our list (opt-out), at any time, you can do so by clicking on the unsubscribe link at the bottom of each email communication you receive from us. You can also opt out by contacting the Privacy Co-Ordinator Tony O’Keeffe at gdprcompliance@blarney.com

Your rights

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below: -

1. The right to access data relating to you (‘access right’). Please see Form 1a [here](#);
2. The right to rectify/correct data relating to you (‘right to rectification’). Please see Form 2a [here](#);
3. The right to object to processing of data relating to you (‘right to object’). Please see Form 3a [here](#).
4. The right to restrict the processing of data relating to you (‘right to restriction’). Please see Form 4a [here](#);
5. The right to erase/delete data relating to you (i.e. the “right to erasure”). Please see Form 5a [here](#); and
6. The right to ‘port’ certain data relating to you from one organisation to another (‘right to data portability’). Please see Form 6a [here](#);

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

The controller of your Data for the purposes of GDPR is Blarney Woollen Mills Ltd.

Changes to this policy

We reserve the right to change this Policy from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that Data and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide Data after we post any such changes, you accept and agree to this Policy as modified.

Contact Us

Questions, comments, requests and complaints regarding this Policy and the information we hold are welcome and should be addressed to the Privacy Compliance Co-Ordinator Tony O’Keeffe gdprcompliance@blarney.com All requests will be dealt with promptly and efficiently.

This Privacy Policy will take effect as in from 25 May 2018

FORM NO. 1a

ACCESS REQUEST FORM

You have the right to access and receive a copy of personal data relating to you (“Data”). We ask that you complete this form, so we can determine the details of your request, and respond to and implement your request as quickly as possible.

This process will provide you with Data in manual or electronic form. Information relating to third parties or other information exempt under applicable law(s) will not be provided.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to: **Data Privacy Co Coordinator Tony O’Keeffe** at gdprcompliance@blarney.com

Agent of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject’s behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone No	
e-mail	
Mobile	
If applicable; Current/last post held in Group	
Department	
Office location	
Your employee no. (if any)	
If applicable: for Hotels only	
Dates of Staying in Hotel	
Dates of visits to Hotel/Health Center/Gym/Spa etc.	
Any other relevant Information:	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Details regarding what information you are looking for. The more details you can give to us the better we will be able to respond to you!	
Hard copy files (please specify department & location, if known)	
Search criteria (<i>i.e.</i> name, key word, date),	
Connection to file (<i>i.e.</i> employee/partner/staff/client/supplier)	
Electronic data (please specify system, if known)	
Search Criteria (please specify the search criteria, <i>e.g.</i> system name, identifier no., if known)	
Connection to file (<i>i.e.</i> employee/partner/staff/client/customer/supplier)	
Any other filing system	
Search criteria	
Any other information you feel might assist us in responding to your request	

We promise to make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 2a

DATA CORRECTION/UPDATE REQUEST FORM

You have the right to correct and update personal data relating to you (“Data”) that is inaccurate. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will correct and update the information requested.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to **Privacy Compliance Co-Coordinator Tony O’Keeffe** at gdprcompliance@blarney.com

Please also provide any documentation you have to prove that the information you wish to update needs to be updated or corrected.

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the requestor’s behalf.

Please complete as much of the following information as you can:			
Full name of data subject	(Title)	(First name)	(Surname)
Present Address			
Street			
Town			
County			
Postcode			
Other contact details			
Telephone			
Email			
Mobile			

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Category of personal information	Personal Information Currently on File	Corrected Personal Information
<i>e.g. name, address.</i>		

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 3a

OBJECTION TO PROCESSING FORM

You have the right to object to our processing of personal data relating to you (“Data”) in certain circumstances. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will cease processing this Data for the purposes to which you object.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to the **Privacy Compliance Co-Coordinator Tony O’Keeffe** at gdprcompliance@blarney.com

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject’s behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Uses of personal information that you object to	Reason for objecting to these uses of your personal information
<i>Please make reference to the uses of personal information set out in our privacy notice</i>	<i>e.g. our uses of the personal information are unlawful, specifying precisely why; you no longer want to receive direct marketing messages from us</i>

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 4a

RESTRICTION REQUEST FORM

You have the right to restrict our processing of personal data relating to you (“Data”) in certain circumstances. We ask that you complete this form, so we can establish the details of your request and, where possible, implement your request.

If your request is valid, we will restrict our processing of this Data unless you give your consent to us using it in the future, or we need to use it for other legal reasons.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to Privacy Compliance Co-Coordinator Tony O'Keeffe at gdprcompliance@blarney.com

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject’s behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Uses of personal information to be restricted	Reason for restricting these uses of your personal information
<i>Please refer to the uses of personal information set out in our privacy notice</i>	<i>e.g. the personal information is inaccurate, our uses of it are unlawful, etc.</i>
Uses of personal information to be restricted	Reason for restricting these uses of your personal information

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, considering the complexity and number of requests.

Signature _____

Date _____

FORM NO. 5a

ERASURE REQUEST FORM

You have the right to have personal data relating to you (“Data”) deleted in certain circumstances. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will delete the information requested, unless we are required by law to keep it - in this case we will advise you of what we are keeping, and the reasons why.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and address) to **[Privacy Compliance Co-Coordinator] Tony O’Keeffe** at gdprcompliance@blarney.com

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject’s behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Personal Information Currently on File to be deleted	Reason why that personal information should be deleted
<i>e.g. name, mobile number, email address</i>	<i>e.g. is the information inaccurate or out of date?</i>

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 6a

PORTABILITY REQUEST FORM

Where we use your personal information to fulfill our contractual obligations to you, or where you have consented to our use of personal data relating to you (“Data”), and where this Data is processed by us automatically, you have the right to 'port' any such Data you provide to us subject to certain requirements.

This means you have the right to receive a copy of it in a machine-readable format and to have it transmitted to another company. We ask that you complete this form, so we can determine the details of your request and implement your request.

This process will provide you with certain personal information that you have provided to us, in a format that can be read electronically and, if you wish this, can be sent to another data controller.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to Privacy Compliance Co-Coordinator Tony O'Keeffe at gdprcompliance@blarney.com

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject’s behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

To help us to respond to your request as quickly as possible, please provide as much detail as possible regarding the personal information you seek. If you wish to 'port' all applicable personal information, please write 'all' below	Names and contact details of companies to which that data should be transmitted
<i>e.g. all information I have uploaded to the website; payment details; or billing and delivery addresses.</i>	

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____