

# **LSP Holidays & Vacations LTD Data Privacy Policy / Transparency Notice**

## **Who is responsible for the data?**

LSP Holidays & Vacations LTD is responsible for the data collected

## **The data we collect about you**

We collect data from you when you make a purchase, request information, subscribe, participate in a survey, post a question or answer, upload content or otherwise actively send us data on our Site. This may include, but is not limited to, first and last name, email address, telephone number (including mobile phone number), street address, gender, and any other data included in a submitted profile or resume.

## **Retention of your data**

Where you are a registered user of the Site through booking a course/workshop/holiday, we retain Your Data for as long as you remain an active user of LSP Holidays & Vacations LTD. Where there has not been any activity on your account for three years we will contact you to check you still wish to retain your account with us. Where you decide to cancel your account or we do not hear further from you, your account will be de-activated and Your Data will be deleted. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for marketing purposes whilst your account remains active and for the period of time referred to above. **This is subject to exercising your right to unsubscribe from receiving such correspondence at any time.**

## **What we do with your data.**

We use your personal data to:

- Provide our services, products and features to you – primarily to provide photography holidays and workshops.
- To measure and improve those services, products.
- To protect our users and provide them with customer support.
- To inform users of future courses, photography tips, other services and products
- When you give contact information (such as your name and email address) and other forms of Personal and Non-Personal Data, you agree that LSP Holidays & Vacations LTD may, as part of its services to you, communicate with you, through means such as email, telephone (including mobile phone), or postal mail.
- We share your data solely with our sister company Lillian Spibey Photography. Solely for informing you about Lillian Spibey Photography tips, workshops, events, competitions and future courses.

## **Legal basis of collection**

Performance of a Contract/Service

- Most of the Personal Data processed by LSP Holidays & Vacations LTD is necessary for the performance of our agreement with you, or conditional information required prior to entering into the agreement, such as dietary needs and contact information

#### Legitimate Interest

- Such legitimate interests will include where LSP Holidays & Vacations LTD sends you marketing about products and services, where we believe you have a reasonable expectation that we will perform a particular type of processing on your behalf, or where such processing is strictly necessary for fraud detection and prevention. LSP Holidays & Vacations LTD will only rely on such a grounds where an assessment has been performed balancing the interests and rights involved and the necessity of the processing in order to provide our services, products and features to you.

#### Consent

- In certain situations, LSP Holidays & Vacations LTD relies on your consent in order to process your Personal Data. Where LSP Holidays & Vacations LTD requires your consent in order to collect and process certain Personal Data, we seek your consent at the time of provision, and such processing will only be performed where consent is secured.

### **Requesting access to the data and deletion**

LSP Holidays & Vacations LTD subscribers are able to edit, update and unsubscribe their Personal Data held by Convertkit, and if you have any queries or complaints we encourage you to contact us at [courses@lillianspibeyphotography.com](mailto:courses@lillianspibeyphotography.com) .

Alternatively, and if you have given personal data at point of booking a holiday/workshop you may make a formal request to have LSP Holidays & Vacations LTD rectify any inaccurate Personal Data on your behalf by sending an email to [courses@lillianspibeyphotography.com](mailto:courses@lillianspibeyphotography.com) . Your email should also attach a copy of your passport or national identity card (for identity verification purposes).

### **Security of your data**

LSP Holidays & Vacations LTD Stores personal data on:

- MS Excel spreadsheet database based on Dropbox Cloud storage
  - MS Excel spreadsheet is password protected
  - 
  - Dropbox password protected
  - All devices with access to Dropbox and relevant files are password protected.
- Convertkit
  - LSP Holidays & Vacations LTD stores all collated personal data on Convertkit.
- Photographs
  - Photographs are stored on password protected external hard drives.
- *Please also be aware that Convertkit and Dropbox provide hosting, data storage and other services pursuant to standard terms and conditions that may be non-negotiable;*

*these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures. However, we will not be liable (to the fullest extent permitted by law) for any damages that may result from the misuse of any information, including Personal Data, by these companies*

- *LSP Holidays & Vacations LTD seeks to use reasonable security measures to help protect against the loss, misuse and alteration of the Personal Data under LSP Holidays & Vacations LTD control. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. In addition, please note that emails, messages sent via your web browser, and other similar means of communication with other users, are not encrypted. Therefore, while we strive to protect your information, we cannot guarantee its security.*

## **Sharing of your personal data**

LSP Holidays & Vacations LTD does not currently share any Personal data with any third party apart from Lillian Spibey Photography as stated above.

## **Photographs of students and holidaymakers**

Photography of students and holidaymakers (identifiable individuals)

- LSP Holidays & Vacations LTD asks for explicit consent to use photographs for marketing media where:
  - Photographs are taken by another student or by a representative of LSP Holidays & Vacations LTD of a single individual, or a small group of individuals (groups that are immediately identifiable), where individuals are the main subject of the photograph. LSP Holidays & Vacations LTD will contact the individual/individuals for consent prior to using the photography in any media such as, but not limited to website, social media, exhibitions.
  - Consent can be withdrawn at any time by informing LSP Holidays & Vacations LTD in writing to our registered office, or via email : [courses@lillianspibeyphotography.com](mailto:courses@lillianspibeyphotography.com) .

## **Cookies**

Please see our [cookie policy](#)

## **Policy updates**

Please review the “Last Updated” legend at the top of this page to determine when this Privacy Policy was last amended. Any changes to this Privacy Policy will become effective on the “Last Updated” date indicated above. By using the Site or providing information to us following such changes, you will have accepted the amended Privacy Policy. If LSP Holidays & Vacations LTD is going to use Personal Data collected through the Site in a manner materially different from that stated at the time of collection, then LSP Holidays & Vacations LTD will notify users via email and/or by posting a notice on LSP Holidays & Vacations LTD Site for 30 days prior to such use or by other means as required by law.

## **Who to contact?**

Contact on email [courses@lillianspibeyphotography.com](mailto:courses@lillianspibeyphotography.com) or by post to LSP Holidays & Vacations LTD, Hop House, 1 Colekitchen Lane, Gomshall, GU59LH

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