

## **HIGHLAND HUTS**

### **Privacy & Cookie Policy**

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#### **Effective from 11 October 2026**

Policy version: HH-PC-11/10/2026

Highland Huts Ltd - Company No. SC898546

Registered Office: 48 West George Street, 2nd Floor, Office 2/3, Glasgow, G2 1BP

Email: [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk)

Highland Huts Ltd is committed to protecting personal information and respecting the privacy of customers, prospective customers and website visitors.

This Privacy & Cookie Policy explains how Highland Huts Ltd (the Company) collects, uses, stores, shares and protects personal data, including information collected through our quotation builder, and how our website uses cookies and similar technologies.

We process personal information in accordance with applicable UK data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended. This combined Policy takes effect on 11 October 2026.

Submitting a quotation request does not itself create a contract or amount to consent for unrelated marketing or optional cookies. Where consent is legally required, we request it separately.

#### **1. Data controller and transition from Bravalan Ltd**

1.1 Highland Huts Ltd, Company No. SC898546, is the data controller responsible for personal information collected and processed in connection with its own business activities.

1.2 Our registered office is 48 West George Street, 2nd Floor, Office 2/3, Glasgow, G2 1BP. Data protection enquiries can be sent to [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk).

1.3 Highland Huts Ltd is not currently required to appoint a formal Data Protection Officer. Enquiries about personal information can be directed to the contact address above.

1.4 Up to and including 10 October 2026, Highland Huts operated as a trading name of Bravalan Ltd, Company No. SC855006. From 11 October 2026, Highland Huts Ltd, Company No. SC898546, became responsible for new Highland Huts customer enquiries, quotations and orders. Bravalan Ltd and Highland Huts Ltd are separate legal companies.

1.5 Information originally collected by Bravalan Ltd remains subject to that company's data protection obligations unless the information is lawfully transferred or disclosed to Highland Huts Ltd. If a transfer takes place, we will identify a proper lawful basis and provide the required privacy information to affected individuals.

#### **2. What personal data we collect**

2.1 Contact information: your name, email address, telephone number, full postal or home address, postcode, billing or delivery address, and any other contact details you give us when requesting a quotation or placing an order.

2.2 Quotation, project and delivery information: the hut sizes, layouts, finishes, options, specifications, measurements and files you submit; the estimated delivery charge based on your postcode; any quotation reference or order-style record created by our website; delivery addresses, access details, agreed placement instructions and handover notes; photographs or video taken before, during or after delivery where reasonably needed to record condition or investigate an issue; and messages about your proposed or completed project. Delivery images may occasionally contain identifiable people or property details.

2.3 Payment and transaction information: where an enquiry becomes an accepted order, we may keep invoices, deposit and payment records, agreed delivery charges payable to Highland Huts, refunds and related financial information. Where we engage an independent HIAB or haulage operator for delivery, we may also keep the operator's invoices and our records of payment to that operator. We do not currently take customer purchases or payments through our website or through a WooCommerce checkout. Payment arrangements are confirmed directly with customers. We do not collect full payment-card details through the online quotation builder.

2.4 Technical information: depending on the services used, this may include an IP address, browser and device information, operating system, pages visited, dates and times, website interactions, cookie choices and security or diagnostic records.

2.5 Uploaded customer materials: photographs, plans, drawings, sketches, screenshots and other reference files you choose to provide for quotation, design or project discussions.

2.6 Marketing preferences: information about whether you have opted in to receiving marketing communications, together with any withdrawal or objection you make.

2.7 We do not ordinarily need special-category information such as health information for our quotations or orders. Please avoid including unnecessary sensitive personal information in messages and file uploads.

### **3. How we collect personal data**

3.1 Directly from you: when you use our online quotation builder, submit your name, email, telephone number, address and postcode, select hut options, upload project materials, request a specification link, contact us by email, telephone or form, later confirm an order, arrange delivery or request aftercare.

3.2 Automatically through our website: our hosting, website security and any active cookies, browser storage or analytics tools may collect technical information when you use the site. The exact technologies and any applicable consent choices are addressed in section 11.

3.3 From other organisations: where relevant, we may receive order, delivery, damage, insurance or payment information from banks, transport or HIAB operators engaged by Highland Huts, accountants, insurers, technical support providers or other organisations involved in delivering a service.

3.4 Where data comes from another organisation rather than directly from you, we will ensure there is an appropriate lawful basis for receiving and using it, and provide any privacy information required by law.

### **4. How we use personal data**

4.1 Quotations and specifications: we use your information to create estimated prices and delivery calculations, save your requested hut options, produce a quotation, and discuss or confirm specifications. Our website uses WooCommerce and related quotation tools to create an order-style administrative record containing these details. The record is a quotation/enquiry, not evidence that you have purchased a hut or formed a binding contract.

4.2 Customer communication: we respond to enquiries, provide requested information, discuss design choices and share production or delivery updates.

4.3 Confirmed orders: if you later accept an Order Confirmation and Final Specification and pay the required deposit, we use necessary information to manage the resulting contract, Hut and delivery invoices, production, delivery and aftercare. Where Highland Huts arranges delivery, we engage and pay the independent HIAB or haulage operator and charge the Customer the agreed delivery price directly. We may use relevant delivery details and photographs to organise positioning, document handover or investigate damage. Orders and payments are arranged directly with customers, not completed through an online checkout.

4.4 Aftercare and business administration: we respond to warranty enquiries, investigate complaints, organise repairs, keep appropriate accounting and transaction records, and meet other legal requirements.

4.5 Website operation and security: we use information where necessary to provide website functions, maintain security, prevent misuse and improve how the website and services operate.

4.6 Marketing: we send promotional communications only where a lawful basis exists and the relevant electronic marketing rules are met. We do not use customer information for an incompatible purpose unless the law permits or requires it.

## **5. Lawful bases for processing**

5.1 Contract: we process information when necessary to perform a contract with you or take steps you request before entering into one, such as preparing a quotation or final specification. A quotation created as an order-style record in our website administration system is not, by itself, a contract.

5.2 Legal obligation: we process and retain information where necessary to comply with tax, accounting, regulatory or other legal obligations.

5.3 Legitimate interests: where appropriate, we use information for purposes such as responding to enquiries, maintaining customer relationships, improving services, securing our website, preventing fraud and establishing, exercising or defending legal claims, provided these interests are not overridden by individuals' rights and freedoms.

5.4 Consent: where consent is required, for example for certain marketing messages or non-essential website technologies, we seek it separately. Consent may be withdrawn at any time without affecting the lawfulness of prior processing.

5.5 The lawful basis depends on the particular activity. Different bases may apply to different items of information held as part of the same customer project.

## **6. How we store and protect personal data**

6.1 We take reasonable technical and organisational measures to protect personal information from accidental loss, unauthorised access, alteration, disclosure or destruction.

6.2 As appropriate to the systems in use, these measures include HTTPS website connections, password-protected accounts, restricted access, secure hosting infrastructure, appropriate data backups and access controls for business documents.

6.3 Information is made accessible only to people who reasonably need it for an authorised business purpose. Access may be provided to trusted contractors or service providers where necessary and subject to applicable safeguards.

6.4 Although we use appropriate measures, no internet service or electronic storage system can be guaranteed completely secure. We assess any personal data breach and take action, including reporting or notifying affected individuals, where required by law.

## **7. Data retention**

7.1 We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, or where longer retention is required or permitted by law.

7.2 Customer orders and financial records: invoices, payment records, contracts and associated accounting information are normally retained for at least six years, or longer where applicable tax, contractual or legal requirements make this necessary.

7.3 Incomplete quotations: our website may store contact information, selected hut options, delivery postcode and any generated quotation or specification reference while an enquiry is being prepared. If you do not complete or submit your specification within 30 days, information that is no longer required may be deleted or anonymised following review.

7.4 Submitted quotations and active enquiries: order-style quotation records and submitted specifications may be retained for up to two years after the enquiry is closed, unless a

confirmed order, accounting obligation, warranty, legal claim or another lawful reason justifies longer retention. A quotation record is not automatically treated as a completed purchase.

7.5 General enquiries: correspondence that does not result in an order is normally retained for up to 12 months after the enquiry is resolved, unless it is needed for another lawful purpose.

7.6 Completed orders and aftercare: relevant project, contractual and warranty records may be kept for the period reasonably necessary to support contractual duties, warranties and potential legal claims.

7.7 Marketing records: information is normally retained until you unsubscribe, withdraw consent or it is no longer needed. We may keep minimal suppression information to ensure we respect your objection to further marketing.

7.8 Uploaded files: photographs, drawings and other materials are normally retained as part of the related quotation or project records. They are removed or anonymised when no longer required under the applicable retention period.

7.9 These are normal retention periods, not automatic guarantees of deletion on a fixed day. Where information is no longer needed, we take reasonable steps to securely delete or anonymise it.

## **8. File uploads and customer materials**

8.1 You may choose to provide drawings, photographs, sketches, plans, screenshots and other files to explain your requirements. We use these to consider your enquiry, prepare a quotation or specification and manage an agreed project.

8.2 You should only upload materials that you are entitled to share for this purpose. If files contain information about other people, please ensure that supplying that information is lawful and appropriate.

8.3 We recommend that files do not include unnecessary sensitive personal information, identity documents, bank details or other unrelated confidential material.

8.4 We may share files with employees, subcontractors or professional advisers involved in the project where reasonably necessary. Files remain subject to the retention and safeguarding arrangements described in this Policy.

## **9. Sharing your personal data**

9.1 We do not sell or rent personal information. We disclose it only where there is an appropriate business or legal reason.

9.2 Delivery and transport providers: where Highland Huts arranges delivery, we appoint and pay an independent haulage or HIAB operator. We may share the Customer's name, telephone number, delivery address, access conditions, preferred placement location and other details needed to arrange and carry out safe collection, transport, lifting and positioning. Relevant delivery photographs or incident information may also be shared to investigate a problem or pursue an insurance claim. The operator invoices Highland Huts rather than the Customer for Company-arranged delivery. The operator may act as an independent data controller in relation to information it uses for its own legal and operational responsibilities.

9.3 Banks and payment service providers: when a quotation becomes a confirmed order, payments for the Hut and any agreed delivery charge are made to Highland Huts, and relevant transaction information may be handled by our bank or another payment provider under its applicable terms and privacy notice. We pay any HIAB or haulage operator engaged by Highland Huts separately. We do not currently use the website to take customer payments.

9.4 Accountants, insurers and professional advisers: information may be shared where necessary for financial administration, advice, insurance, resolving disputes or legal claims.

9.5 Website and IT providers: hosting, email, website support, security, data storage and other service providers may process information to deliver services on our behalf.

9.6 Staff, subcontractors and specialists: relevant project information may be shared where reasonably necessary to manufacture, customise, install or deliver a hut.

9.7 Regulators and public authorities: we may disclose information where the law requires it or in response to an appropriate lawful request.

9.8 Where a service provider processes information for us, we require suitable data protection arrangements. We do not supply customer information to unrelated businesses for their own marketing without an appropriate lawful basis.

## **10. International data transfers**

10.1 Some service providers used by the Company may store, access or otherwise process personal information outside the United Kingdom.

10.2 Where a transfer is subject to UK GDPR international transfer requirements, we will ensure that an appropriate legal transfer mechanism is in place, such as UK adequacy regulations, an International Data Transfer Agreement, the UK Addendum to EU Standard Contractual Clauses or another legally permitted safeguard or exception.

10.3 We will assess transfers and implement any additional measures reasonably required by applicable law. You may contact us for information about relevant safeguards.

## **11. Cookies and similar technologies**

11.1 Cookies are small text files stored on a computer, phone or other device when a website is visited. We may also use similar technologies, such as local or session storage, that store or access information on a device. Some operate only during a visit, while others remain for a longer period. This section explains the types of technologies relevant to our website and the purposes for which they may be used.

11.2 Essential website functions. Cookies and similar technologies may be needed to operate the website, maintain a requested session, process an enquiry or form, remember a choice during the quotation process, or protect the site against misuse. Where a technology is strictly necessary to provide a service you request or falls within another applicable legal exception, prior consent is not required.

11.3 Quotations and forms. Our website uses WordPress, WooCommerce and associated quotation and specification tools. These systems may use temporary session information to keep selected hut options together or support a submitted form. The information supplied through a quotation may also be saved to our website database as an order-style quotation record. Saving that record does not, by itself, mean a cookie is used or that an online purchase has taken place. We do not take customer payments through the website.

11.4 Security and preferences. Some technologies may help prevent spam, protect forms or website access, remember privacy choices or support a preference selected by a visitor. Whether consent is needed depends on the actual purpose and whether the conditions of a legal exception are met.

11.5 Website statistics. Where we use analytics or performance tools, they may help us understand visitor numbers, frequently viewed pages, how the website is used and technical problems. We will obtain consent where it is legally required. The limited statistical-purposes exception may apply only where its conditions are met, including clear information and a simple, free way to object.

11.6 Third-party content. Our website may link to or display content from external services, such as social media sites, maps, videos or accommodation platforms. Visiting an external site is subject to that provider's own policies. If third-party content is embedded on our website, the provider may use cookies or similar technologies; any non-exempt use must comply with applicable consent requirements.

11.7 Optional advertising or tracking. If advertising, profiling or other optional tracking technologies are introduced or enabled, we will explain their purpose and seek consent beforehand where required. We do not treat optional advertising or cross-site tracking as essential merely because it may benefit our business.

11.8 Your choices. Continuing to browse our website does not count as consent to non-essential cookies. Where consent is required, visitors must be given an appropriate way to accept or decline the relevant technologies and to withdraw consent. Where an exception requires an objection mechanism, a simple and free way to object must be available.

11.9 You can also use your browser settings to block or delete cookies. Restricting essential cookies or storage may affect quotation forms and other website features. Browser settings are not a substitute for any consent or objection mechanism we are legally required to provide.

11.10 This is a general explanation organised by purpose rather than a list of individual cookie names. The technologies and their duration can vary according to the website features and third-party services in use. We will keep this information under review and provide further information about our use of cookies or browser storage on request at [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk). Where the use of a technology involves personal data, the remainder of this Privacy & Cookie Policy also applies.

## **12. Your rights under UK GDPR**

12.1 Access: you may request confirmation of whether we process your personal data and receive a copy of information to which you are legally entitled.

12.2 Rectification: you may request that inaccurate personal information is corrected, or incomplete information completed.

12.3 Erasure: you may request deletion where the legal conditions for the right to erasure apply.

12.4 Restriction: in certain circumstances you may ask us to restrict how personal information is processed.

12.5 Objection: you may object to certain processing, including processing based on legitimate interests. You may object to direct marketing at any time; where you do so, we will stop processing information for that marketing purpose.

12.6 Data portability: where applicable, you may request certain information in a structured, commonly used, machine-readable format or request transfer to another service provider.

12.7 Withdrawal of consent: where our lawful basis is consent, you may withdraw that consent at any time without affecting processing carried out before withdrawal.

12.8 Automated decisions: you have rights relating to certain solely automated decisions that produce legal or similarly significant effects. Our quotation builder may calculate indicative prices and create an order-style quotation record, but this does not itself accept an order or make a legally or similarly significant decision about you.

12.9 To exercise a right, contact [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk). We will normally respond within one calendar month, subject to applicable rules permitting an extension, and may ask for reasonable information to verify your identity.

12.10 Data protection rights are subject to legal conditions, exemptions and limits. Some information may need to be retained to meet legal obligations or deal with valid legal claims.

## **13. Marketing communications**

13.1 We may send information about our shepherd's huts, completed builds, products or business updates where we have an appropriate lawful basis and comply with the electronic marketing rules applicable to the communication.

13.2 Where consent is required, it will be requested separately from the information needed for a quotation or order. Supplying contact details or generating an order-style quotation record does not itself mean that you agree to unrelated promotional messages.

13.3 Communications necessary to respond to an enquiry, manage an order or provide aftercare are not treated as optional marketing simply because they are sent by email.

13.4 You may opt out of marketing at any time using an unsubscribe facility, where provided, or by emailing [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk). We will respect objections and withdrawal requests in accordance with applicable law.

13.5 We do not sell customer marketing lists or provide customer contact details to unrelated businesses for their own promotional purposes without an appropriate lawful basis.

#### **14. Third-party websites and links**

14.1 Our website may link to, or where configured embed content from, accommodation booking platforms, social-media services, suppliers and other external websites. Links do not themselves amount to loading an embedded service. External services may have their own privacy notices and cookies.

14.2 The Company does not control or take responsibility for the independent data processing practices of third-party websites. We encourage visitors to review the privacy information provided by those organisations before supplying personal data.

#### **15. Changes to this Privacy & Cookie Policy**

15.1 We may amend this Privacy & Cookie Policy to reflect changes in our business, website features, quotation tools, cookie settings, service providers, legal obligations or personal-data processing practices.

15.2 The current version will be published on our website with the applicable effective date and policy version. Previous versions may be retained for reference and record-keeping.

15.3 Where a material change requires us to provide additional privacy information or obtain consent, we will take the steps required by applicable law. Changes do not remove rights individuals already hold under data protection law.

#### **16. Contact, requests and data protection complaints**

16.1 Please contact Highland Huts Ltd at [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk) with privacy questions, requests to exercise your rights or concerns about the handling of your personal information. Postal correspondence may be sent to the registered office identified at the beginning of this Policy.

16.2 We will acknowledge receipt of a data protection complaint within 30 days, investigate it appropriately and provide a response without undue delay. Where more time is needed, we will provide appropriate progress information.

16.3 If a complaint identifies a problem, we will consider appropriate corrective action. We may ask for further information to understand the concern and to verify identity where necessary.

16.4 You may also raise a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator. Its website is <https://ico.org.uk>. You do not need to accept our response before contacting the ICO.

16.5 We aim to resolve privacy concerns promptly and transparently, without limiting any right to contact the ICO or seek another remedy available by law.

#### **17. Business transparency**

17.1 Highland Huts Ltd (SC898546) is a Scottish private limited company manufacturing and supplying shepherd's huts.

17.2 Up to and including 10 October 2026, Highland Huts business activities were conducted by Bravalan Ltd (SC855006). From 11 October 2026, new Highland Huts enquiries, quotations and customer contracts are handled by Highland Huts Ltd (SC898546), a separate company.

17.3 Earlier Bravalan Ltd contracts and data do not automatically transfer to Highland Huts Ltd. Our Terms & Conditions cover product contracts; for privacy questions contact [john@highlandhuts.co.uk](mailto:john@highlandhuts.co.uk).