

Privacy Policy

Last updated: 24/11/2018

Introduction

We respect your right to privacy and take your privacy seriously. We are committed to protecting and securing any personal information you give us. This Privacy Policy explains who we are; how we collect, use and share personal information about you; how you can manage the information you give us and exercise your privacy rights; and how we protect your information. This Privacy Policy relates to our use of any personal information we collect from you via our website or provide us in any other way.

Who are we and what do we do?

We are the owners of Casa Sant Roc and provide holiday accommodation. We book the property and provide support regarding the booking and during any stays at the villa together with our property manager.

As used in this Privacy Policy, the term “Owner” refers to a property owner. The term “Traveller” refers to a user who is using the site to look for properties to rent.

Key things you should know about how we use your information:

- We use your information (and the information of those travelling with you) for purpose of enabling travel bookings.
- This includes sharing your booking information with our Suppliers in order for them to fulfil your booking.
- We also engage other third-party vendors who provide services or functions on our behalf.
- Where you choose to receive marketing information, we will let you know about any special offers that may be of interest to you, including our loyalty programs. You are able to opt-out at any time by using our contact details below at the end of this policy.
- You can contact us about updating or accessing your information by using our contact details below at the end of this policy.
- Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com’s data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the

secure handling of credit card information by our store and its service providers.

- It's important to note that third-party services, such as Google Analytics, facebook, Instagram, twitter or other applications offered through the Wix App Market, place cookies or utilize other tracking technologies through Wix's services, These organisations have their own policies regarding how they collect and store information. As these are external services, such practices are not covered by our Privacy Policy.
- From time to time and usually following an interaction with us, we will ask you for your feedback to ensure we are providing the best service we can.
- The data controller of your personal information is Vicky Grandfield. Please rest assured that we take appropriate steps to protect your privacy and security. We recommend that you read this Privacy Policy in full to ensure you are completely informed..

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details given at the end of this policy.

External Links

Any parts of our Online Services link you to other websites or Apps, those newly opened links do not operate under this Privacy Notice. We therefore recommend you examine the privacy notices/statements/policies posted on those other online areas to understand their procedures for collecting, using, and disclosing personal information.

What personal information do we collect and why?

- Information that you provide directly to us

We may ask you to provide personal information directly to us. For example, we may ask you to provide your contact details such as full name, telephone number and email address in order to:

- enable your travel booking;
- provide the services and information you request such as details about your booking;
- have an emergency contact number for you;
- update loyalty programme information;
- submit your enquiries.

o Special Categories of Personal Information

Certain types of personal information, such as some government-issued identification numbers, religion, health or sexuality, are considered sensitive and require additional protection under applicable laws. We limit the circumstances under which we may collect sensitive personal information; examples of this information include the following:

- Health-related information may be needed for you to arrange or book appropriate travel accommodation and accessibility or facility requirements.
- Government-issued identification numbers like passport or driver's license number may be required for vehicle rental or other travel reservation.
- Other information that you can specify at your option and which may imply or suggest information like religion, health or other information, such as dietary needs.
- Information Voluntarily Provided About Your Travel Companion(s)

If you make a reservation over the phone, and if as part of that reservation you wish to purchase additional travel products on behalf of someone else, we will request personal information about that individual. You should obtain the consent of any other individual(s) prior to providing us with their personal information. Should your travel companion want to amend or delete their information themselves they can contact us directly at the information in the "Contact Us" section at the bottom of this policy.

- Information that we collect automatically

We may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type (such as Firefox, Safari, or Internet Explorer), your Internet Service Provider (ISP), your operating system and carrier. For website users, details of any referring website or exit pages as well as broad geographic location (e.g., country or city-level location) and also collected. We may also collect other technical information such as how your device has interacted with our Online Services, including the pages accessed and links clicked, i.e., trips viewed and the time and date of these.

Collecting this information enables us to better understand the visitors who come to our Online Services, where they come from, and what content on our Online Services is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Online Services for our visitors, for example, to customize your user experience, tailor your searches and show you advertisements that may be of interest. We also use this automatic information to prevent and detect fraud.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" [link].

- Information we collect when you communicate with us via the following methods

- Traveller and Owner Reviews

We may collect reviews written by Travellers on the property and/or written by Owners on a Traveller's stay ("Owner Reviews"). Traveller Reviews are displayed on our Site. Travellers' permission will be requested to use these reviews and whether they will be anonymous.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information.

Who do we share your personal information with?

We may disclose your personal information to the following categories of recipients:

- **Third party services providers** who provide data processing services to us (for example, to support the delivery of; provide functionality on; or help to enhance the security of our Online Services), or who otherwise process personal information for purposes such as credit card processing, business analytics, customer service, marketing, distribution of surveys or sweepstakes programs, to facilitate the delivery of online advertising tailored to your interests and fraud prevention. Where third-party service providers have access to data they will only collect information as needed to perform their functions. They are not permitted to share or use the information for any other purpose.
- **Travel suppliers** such as hotel, car rental, insurance, Owners, and, where available, activity providers, rail and cruise lines, who fulfil your travel reservations. All services provided by a such third-party travel supplier are described as such. These suppliers are not controlled by Expedia and personal information disclosed to them is subject to the applicable supplier's privacy policy and security practices. Please note that these travel suppliers or Owners also may contact you as necessary to obtain additional information about you, facilitate your travel reservation, or respond to a communication you submit in accordance with their own independent Privacy Policy as applicable.
- Your online profile may be viewable by other users, including Owners, of our Online Services. For Owners, property listings may display statistics of usage, such as information related to the responsiveness of owners.
- Any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person. This includes applicable tax authorities or other authorities allowed to collect taxes, where necessary to pay taxes from or on behalf of Travellers or Owners to tax authorities in accordance with the Online Services Terms and Conditions and to comply with any valid request;
- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of our company or this website, our customers, or others; and in connection with our Terms and Conditions and other agreements;
- Any **other person with your consent** to the disclosure. The categories of recipients are explained in more detail in the sub paragraphs of this section above, for example, travel suppliers such as properties, hotels, car rental companies and activity providers, who enable us to fulfil your booking. If you have any questions about third-party data sharing, please contact us at the information provided at the bottom of this Privacy Policy.

How do we use your information?

Our legal bases for processing personal information (EEA visitors only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described in this Privacy Notice will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we will have a legal obligation to collect personal information from you such as where it is necessary to use your transaction history to complete our financial and tax obligations under the law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicate with you as necessary to provide our services to you, for security verification purposes when you contact us and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

How do we determine what our Legitimate Business Interests are?

We carry out an assessment to ensure that:

- (i) Our interest in the use of your data is legitimate (i.e., we have a clear business need); and
- (ii) The business need, on balance, does not override your privacy rights.

When determining this, we assess the potential impact a specific use of the data may have on you as a customer and weigh this against our own business needs to ensure that we get the balance right. We also apply a series of security measures to minimise any potential risks.

By way of example in practice we would consider that the collection of our customers' marketing preferences in the course of a booking is a legitimate business interest to have as an online ecommerce company. We believe that this does not unduly impact your privacy rights as you may, most definitely, want to hear about our products and services going forward. However, to protect your privacy rights we ensure that you can opt out of these communications at any time, in your account, in the email itself or through customer services.

In accordance with the legal grounds above, we use the information we collect to:

- fulfil the transactions that you make, such as for Travellers: booking the property
- provide you with travel confirmations and important travel updates for your upcoming trip (via email or SMS);
- verify your identity for fraud prevention purposes;
- manage your account, including processing payments;

- communicate with you in general, particularly if there is a change to your booking;
- provide customer services related to your booking or to respond to any inquiry you make;
- facilitate communication between us
- measure interest in and improve our products, services, and website functionality;
- notify you about special offers and travel-related products and services that may be of interest to you. You may receive these by email, post.
- otherwise customize your experience with this website or App;
- reward you as part of any reward and recognition program you choose to join (whether this is our program or that of a third party);
- obtain information from you, including through feedback you give or surveys you complete;
- carry out statistical analysis about the use of our website and Apps and the services we offer to improve each aspect of what we do;
- protect our rights including our intellectual property for example;
- resolve disputes, collect fees, or troubleshoot problems;
- prevent potentially prohibited or illegal activities;
- enforce our Terms and Conditions; and
- as otherwise described to you at the point of collection.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at the information provided at the bottom of this Privacy Policy.

Data Retention

We retain the personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise the data or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We will anonymise or aggregate your data if we intend to use it for analytical purposes or trend analysis over longer periods.

Your information rights

You can access or update your contact by emailing vickygrandfield@yahoo.co.uk or mail to:-

Vicky Grandfield
30-31 St James Pl,
Bristol BS16 9JB

Your data protection rights [EEA residents]

If you are a resident of the European Economic Area, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us on the contact details given at the end of this policy.
- If you request access to your personal data we will confirm whether we hold your information and provide you with a copy, explaining how we process it and why, how long we store it for and your rights associated with it.
- If you request deletion of your personal information, we will erase it. Please do note that we will need to retain any information that we require to fulfil our legal obligations or to establish, exercise or defend a legal claim.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us on the contact details given at the end of this policy.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by by contacting us on the contact details given at the end of this policy.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Changes to This Notice and How to Contact Us

Updates to this Privacy Policy

Changes to this Privacy Policy will be made when required in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

Contact Us

- If you have any questions or concerns about our use of your personal information, please contact us by
- email vickygrandfield@yahoo.co.uk

mail Vicky Grandfield
30-31 St James Pl,
Bristol BS16 9JB

- The Data Controller of your personal information is Vicky Grandfield.