

# Privacy policy

## 1. INTRODUCTION AND IMPORTANT INFORMATION

I am committed to protecting and respecting your personal data and privacy.

This privacy policy relates to how I use and collect personal data from you when you book with me as a guest or visitor to Ty Cerrig, my self-catering accommodation (**the Property**), use the services or access my website. It also relates to my use of any personal information you provide to me by telephone (including SMS or WhatsApp), in written correspondence (including letter and email), through my social media channels and in person.

Please note that:

- the website is not intended for children under the age of 18 but I may collect personal data belonging to children who are guests of the Property and
- the website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and am not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy of every website you visit.

Whenever you provide personal data, I am legally obliged to use your information in line with all applicable laws concerning the protection of such information; including but not limited to the Data Protection Act 2018 and the General Data Protection Regulation, as it applies to the UK (**UK GDPR**), described in this policy as the “**Data Protection Laws**”.

This privacy policy also forms part of my terms of business and is not intended to override them. This policy may be amended or updated from time to time and any revisions will be posted to this page, so please check back regularly.

## 2. WHO I AM AND HOW TO CONTACT ME

- 2.1 For the purpose of the Data Protection Laws, the data controller is Sarra Munro. I am a private limited company registered in England and Wales under company number **10884894**. My registered office is at 29 Kingsdale Road, Liverpool, L18 1LD. If you want to request more information about my privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Sarra Munro

29 Kingsdale Road, Liverpool, L18 1LD United Kingdom

Email: [hello@stonecottageanglesey.co.uk](mailto:hello@stonecottageanglesey.co.uk)

Telephone: **07713 621498** and ask to speak to the Privacy Officer.

- 2.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). I would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

### 3. THE DATA COLLECTED ABOUT YOU

3.1 I collect and process personal data. Typically, the personal data I collect and process will include identity, contract, transactional, technical, profile, usage and marketing and communications data such as:

3.1.1 **Identity Data** includes first name, last name, title or other identifier (such as job title), marital status, date of birth, gender and images.

3.1.2 **Contact Data** includes billing address, email addresses and telephone numbers.

3.1.3 **CCTV Data** includes data (including but not limited to images, video and sound) gathered by Closed Circuit Television installed at the Property.

3.1.4 **Transaction Data** includes details about services you have purchased from us or your visits to our premises.

3.1.5 **Financial Data** includes bank account and payment card details.

3.1.6 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

3.1.7 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences (including details about your personal likes and dislikes as identified during your visits to my premises), feedback and survey responses.

3.1.8 **Usage Data** includes information about how you use my Property (including but not limited to any property facilities such as website, products and services.

3.1.9 **Marketing and Communications** data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Please note that I may collect and/or process other personal data from time to time. If I ask you to provide any other personal information not described above, the personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point that you are asked to provide your personal information.

3.2 I also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered to be personal data in law as it will not directly or indirectly reveal your identity. For example, I may aggregate your usage data to calculate a percentage of users accessing a specific feature of our services. However, if I combine or connect your aggregated data with your personal data so that it can directly or indirectly identify you, I treat the combined data as personal data which will be used solely in accordance with this policy.

3.3 I do not routinely collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life,

sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). However, I will collect the health information I need to provide special assistance services requested under the booking or where I need to record and report an incident or accident occurring at the Property. Nor do I collect any information about criminal convictions and offences.

3.4 I only collect data from you directly or via third parties (see the section *Third Parties* below).

3.5 It is important that the Personal Data I hold about you is accurate and current. I cannot be held responsible for any inaccurate or incomplete data on my system arising out of your default in this regard. Please keep me informed if your Personal Data changes during your relationship with me.

#### 4. **HOW IS YOUR PERSONAL DATA COLLECTED?**

4.1 I use different methods to collect data from and about you including through:

4.1.1 **Direct interactions.** You may give me your Identity, Contact, Profile and Financial Data by filling in forms or by corresponding with me by post, phone, messaging service, email or otherwise. This includes personal data you provide when you:

- (a) book my Property
- (b) create an account on my website
- (c) subscribe to my additional service(s)
- (d) request marketing to be sent to you
- (e) enter a promotion or survey
- (f) give me feedback or contact me.

4.1.2 **Automated technologies or interactions.** I may also collect your Technical Data about your equipment, browsing actions and patterns when you visit my website. I collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

4.1.3 **Visiting the Property.** I may collect your CCTV Data and Usage Data through my inspection of the Property or through use of surveillance systems at the Property in accordance with our CCTV policy.

4.1.4 **Third parties or publicly available sources.** I will receive personal data about you from various third parties and public sources as set out below:

- (a) Technical Data from the following parties:
  - analytics providers
  - advertising networks
  - search information providers

#### 5. **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where I need to collect personal data by law, or under the terms of a contract I have with you, and you fail to provide that data when requested, I may not be able to perform the contract I have or are trying to enter into with you (for example, to provide you with

services). In this case, I may have to cancel all or part of a service you have with me, but I will notify you if this is the case at the time.

## 6. HOW YOUR DATA WILL BE USED

6.1 I use information held about you to:

6.1.1 carry out my obligations arising from any contracts entered into between you and me and provide our services, including any third-party services I make available to you;

6.1.2 carry out feedback and research on my services; and

6.1.3 notify you about changes to my services.

6.2 I never sell your data to third parties or allow third parties to contact you without your permission.

6.3 I share your data with third parties where there is a legal obligation for me to do so or I have identified a valid lawful basis as set out in the table below (please also see clause 7 below). I may process your personal data without your knowledge or consent where this is required or permitted by law.

6.4 I have set out below in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate. Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data. Please contact me if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a guest or visitor of the Property (including any vehicles).	Identity Contact Usage	Performance of a contract with you.  Necessary for our legitimate interests (to ensure unauthorised visitors do not attend or occupy the Property).
To provide our self-catering accommodation and connected service(s) (including but not limited to activities) to you and to process related transactions, including:  Manage payments, fees and charges	Identity Contact Transaction Usage Marketing and Communications	Performance of a contract with you.  Necessary for our legitimate interests (to recover debts due to us).

Collect and recover money owed to us.		
To provide you with request special assistance.	Identity Contact Health (Special Category Data limited to what is necessary for the provision of special assistance)	Explicit consent.
To manage our relationship with you which will include:  Notifying you about changes to our terms or privacy policy.  Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for my legitimate interests (to keep my records updated and to study how customers use my products/services)
To keep the Property, my staff, contractors and guests secure.	CCTV	Necessary for my legitimate interests (to keep my Property secure and ensure the wellbeing of staff and guests while at the Property). A copy of my Legitimate Interest Assessment (LIA) in relation to my use of the CCTV system is available on request.
To record incidents and accidents occurring at the Property.	Identity Contact Usage Health (Special Category Data)	Necessary to comply with a legal obligation (health and safety).  Necessary for my legitimate interests (to ensure the Property is fit for use by guests and resolve complaints).  I may also use this information to exercise and defend my legal rights and may be

		required by law to process this information.
To enable you to partake in a competition or complete a survey.	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you.  Necessary for my legitimate interests (to study how customers use my products/services, to develop them and grow my business).
To administer and protect my business and my website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Technical	Necessary for my legitimate interests (for running my business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).  Necessary to comply with a legal obligation.
To measure or understand the effectiveness of the advertising I serve to you.	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for my legitimate interests (to study how customers use my products/services, to develop them, to grow my business and to inform my marketing strategy).
To use data analytics to improve my website, services, marketing, customer relationships and experiences.	Technical Usage Profile	Necessary for my legitimate interests (to define types of customers for my products and services, to keep my website updated and relevant, to develop my business and to inform my marketing strategy).
To make suggestions and recommendations to you	Identity Contact	Necessary for my legitimate interests (to develop my

about services that may be of interest to you.	Technical Usage Profile Marketing and Communications	products/services and grow my business).
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## 7. **LAWFUL BASIS FOR PROCESSING**

7.1 I only process your data (which may include providing it to a third party) where I have identified a valid lawful basis to do so. These are as follows:

7.1.1 **Contractual obligation** – means processing that is necessary to comply with my obligations arising out of a contract, for example, where you have bought services from me, I will use the personal data you provide to fulfil my contractual obligations.

7.1.2 **Legitimate Interest** - means in the interest of my business in conducting and managing my business to enable me to give you the best service/product and the best and most secure experience. I make sure I consider and balance any potential impact on you (both positive and negative) and your rights before I process your personal data for my legitimate interests. Where I use legitimate interests, I will record my decision on making this decision. I rely on legitimate interest where processing of the data I hold on you does not, in my opinion, affect your rights or freedoms and is proportionate to my interests e.g. keeping you up to date with my latest services or obtaining your feedback on my service.

7.1.3 **Consent** – I will seek to obtain your consent to process:

(a) your data outside my contractual obligations (see above) unless I have identified a Legitimate Interest (see above); and

(b) any special category data.

7.1.4 **Legal obligation** – I may process your data where it is necessary for us to do so to comply with the law.

7.2 I may also process your personal data in the following circumstances, which are likely to be rare:

7.2.1 **Vital Interests** – where I need to protect your vital interests or someone else's vital interests (the processing is necessary to save a life); and/or

7.2.2 **Public Task** – processing your personal data is needed in the public interest.

## 8. **THIRD PARTIES AND SHARING INFORMATION**

8.1 I will keep your information within the organisation except where disclosure is required or permitted by law or when I use third party service providers (data processors) to supply and support my services to you. I have contracts in place with my data processors. This means that they cannot do anything with your personal data unless I have instructed them to do so. They will not share your personal data with any

organisation apart from us. They will hold it securely and retain it for the period I instruct.

8.2 Please see below the list which sets out the categories of recipients of personal data.

<b><i>SERVICE PROVIDERS WHO MAY RECEIVE YOUR PERSONAL DATA</i></b>	<b><i>LOCATION</i></b> <i>(e.g. within the UK, EEA or outside of the UK/EEA)</i>
<i>IT Support Services</i>	<i>USA</i>
<i>Email provider</i>	<i>USA</i>
<i>Website provider</i>	<i>USA</i>
<i>Banks</i>	<i>UK</i>
<i>Online payment providers</i>	<i>UK</i>
<i>Accountants</i>	<i>UK</i>
<i>Insurers</i>	<i>UK</i>
<i>Solicitors</i>	<i>UK</i>
<i>Software Providers</i>	<i>US</i>

8.3 I may disclose your Personal Data to any competent law enforcement body, regulator, government agency, court or other third party where I believe disclosure is necessary: (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend my legal rights, or (iii) to protect your vital interests or those of any other person.

8.4 I may also be required to share your Personal Data as part of any sale, transfer or merger of my business or assets (or parts thereof). Such disclosure will be subject to the buyer's processing of your Personal Data on terms equal to the protections afforded to you by this policy.

8.5 In addition, third parties may provide us with personal data, and they should only do so where the law allows them to. This may vary my position as Data Controller under clause **Error! Reference source not found.**

## 9. **INFORMATION SECURITY**

9.1 I use appropriate technical and organisational measures to protect the personal information that I collect and process about you. The measures I use are designed to provide a level of security appropriate to the risk of processing your personal information.

## 10. **MARKETING**

10.1 I may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which products, services and offers may be relevant for you (I call this marketing).

10.2 You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.



- 10.3 I strive to provide you with choices regarding certain personal data uses, namely around marketing and advertising. In particular:
- 10.3.1 I will always obtain your express opt-in consent before I share your personal data with any third party for marketing purposes; and
  - 10.3.2 You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## 11. INTERNATIONAL TRANSFERS

- 11.1 Your data is stored by me and my processors in the UK. However, several of my external third parties are based outside the UK. Whenever I transfer your personal data out of the UK, I ensure a similar degree of protection is afforded to it by ensuring that I only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- 11.2 Whenever I transfer your personal data to countries outside of the UK and/or European Economic Area ('EEA'), where I use certain service providers (see clause 8.2), I will rely on an appropriate international data transfer mechanism (such as standard contractual clauses (SCCs), international data transfer agreements (IDTAs) or any future agreed mechanisms) approved by the UK regulatory authority, the Information Commissioner's Office. In addition, I will ensure that I have **received assurances that an adequate level of protection of the personal data is achieved (based on a case-by-case assessment of the circumstances of the transfer), including adequate technical and operational measures in place to protect the personal data.**
- 11.3 Please contact me if you want further information on the specific mechanism used by me when transferring your personal data out of the EEA.

## 12. DATA SECURITY

- 12.1 I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions, and they are subject to a duty of confidentiality.
- 12.2 I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I are legally required to do so.

## 13. DATA RETENTION

- 13.1 I will only retain your personal data for as long as reasonably necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.
- 13.2 To determine the appropriate retention period for personal data, I 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 I process your personal

data and whether I can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

- 13.3 By law I must keep basic information about my clients (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being clients.
- 13.4 In some circumstances you can ask us to delete your data (see below for further information).
- 13.5 I may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case I may use this information indefinitely without further notice to you. Please see clause 3.2.

## 14. YOUR RIGHTS

14.1 Under the data protection laws your rights are:

14.1.1 **To be informed** – I must make this privacy policy (sometimes referred to as a privacy notice) available to you and be transparent over how I process your data.

14.1.2 **Access** – You are entitled to know what details I hold about you and why. I strive to be as open as I can be in terms of giving people access to their personal data. You can find out if I hold any of their personal data by making a formal request under the data protection laws. Such requests should be made using the contact details provided in this policy. If I do not hold information about you, I will confirm this in writing at the earliest opportunity. If I do hold your personal data I will respond in writing. My response will:

- (a) confirm that your data is being processed
- (b) verify the lawfulness and the purpose of the processing
- (c) confirm the categories of personal data being processed
- (d) confirm the type of recipient to whom the personal data have been or will be disclosed
- (e) let you have a copy of the data in format I deem suitable or as reasonably required by you.

14.1.3 **Rectification** – I am obliged to correct or update your details. I will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

14.1.4 **Erasure** – This is also known as the right to be forgotten. Under Data Protection Laws you have the right to require us to erase your personal data under specific circumstances. A request for your personal data to be deleted will be decided on a case-by-case basis and should be submitted in writing to the contact details provided in this policy.

14.1.5 **Restrict processing** – You have the right to 'block' or suppress the processing by us of your personal data.

- 14.1.6 **Portability** – You have the right to obtain the personal data that you have provided to us in a commonly used machine-readable format and reuse it with a different provider.
  - 14.1.7 **Object** – You have the right to object to us processing your data in certain circumstances. You have an absolute right to stop your data being used for direct marketing, but in other circumstances I may still be allowed (or required) to process your personal data if I can show you that I have a compelling reason for doing so.
  - 14.1.8 **Rights in relation to automated decision making and profiling** – I do not use automatic decision making or profiling.
  - 14.1.9 **Withdraw consent.** Where you have given me consent to process your personal data, you can withdraw that consent at any time either by contacting us using the details set out in this policy, or by following the opt-out links in electronic messages where relevant. I do not penalise individuals who wish to withdraw consent and I act on withdrawals of consent as soon as I can.
- 14.2 Please note that:
- 14.2.1 in certain circumstances Data Protection Laws may relieve us of some of my obligations to you under the rights summarised above; and
  - 14.2.2 you may need to provide identification to prove who you are if you wish to invoke any of your rights as provided by the data protection laws and as summarised above.
- 14.3 If you agree, I will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

## 15. **CHANGES TO THE PRIVACY POLICY**

I keep my privacy policy under regular review. This version was last updated on 29/03/2024.