

## **Haskeir Cottage Privacy Policy & Data Protection (GDPR)**

This document explains how we will use and protect our customer's personal information. We are registered with the Information Commissioner's Office (ICO).

### **Required data**

The data you supply is only used to in relation to an enquiry, to complete your booking, to cancel or revise a booking, to communicate with you and to meet our legal requirements.

### **The data you supply**

#### **Information required to complete a booking**

- The full name and address of the person making the booking
- The email address of the person making the booking
- The telephone number of the person making the booking
- The names of all guests staying as part of the booking
- Any additional information you wish to provide about your stay

#### **Information required for The Immigration (Hotel Records) Order 1972(as amended)**

This applies to all serviced and self-catering premises. *Though this legislation is considered to be obsolete and is being considered for repeal, it still remains a legal requirement.* To comply with this legislation we need to collect the following information from all guests.

- full name
- nationality

For guests who are not resident in the UK, as well as not British, Irish or Commonwealth, we must also collect the following information:

- passport number and place of issue (or other document which shows their identity and nationality)
- details of their next destination (including the address, if known) on or before departure.

### **How we collect data**

The data we collect is provided to us by you. It is collected when:

- you complete forms on our online booking system *freetobook*
- you provide information to us in an email via *freetobook* or [stay@hebridesseaviewcottage.co.uk](mailto:stay@hebridesseaviewcottage.co.uk)
- you provide information to us by telephone
- you tell us in person.

### **How we store your data and keep it secure**

Your booking data is initially stored on a secure database operated by our booking manager *freetobook*. This database is fully compliant with the GDPR data rules. When you make a booking using *freetobook* you can see a link to the *freetobook* privacy policy, which is also available at the end of this document. The *freetobook* privacy policy

explains the use of cookies. This *freetobook* database does not store or capture any personal data other than as detailed in 'The data you supply'. Emails we receive via [stay@hebridesseaviewcottage.co.uk](mailto:stay@hebridesseaviewcottage.co.uk) are processed, and when no longer needed deleted promptly.

- Until your visit is complete we store the data on the *freetobook* database.
- We also make paper copies of the data and relevant emails and store this in a filing cabinet only accessed by the owners of Haskeir Cottage. We keep this data for our financial records. Once it is no longer required we will destroy it for example by shredding.
- Once your visit is complete we 'anonymise' your booking and delete emails on the *freetobook* database so your personal data is no longer stored or accessible on the database.
- If you cancel your booking we 'anonymise' your booking and delete emails on the *freetobook* database so your personal data is no longer stored or accessible on the database.
- Haskeir Cottage and *freetobook* do not transfer any personal data to any other party unless legally required to do so.

## Using your personal information

The personal information provided to us will only be used in connection with your booking. We use your personal information to:

- Process your booking and provide confirmation details
- Reply to an enquiry
- Contact you by email to provide our BACS details for your payments, if necessary provide a reminder about payment dates, provide you with access information, and in the event of a cancellation resulting in a refund contact you for your BACS details.
- Respond to any questions or comments via e-mail, and if necessary by telephone.
- Provide information that may be useful to you
- Return any items that you may forget to take with you when you leave
- We will not contact you for marketing purposes or to provide a review

## Your rights

You may request us to provide you with any personal information we hold about you.

You have the right to require us to delete personal information data that we hold about you, subject to our requirement to retain data for finance reporting.

## Freetobook Privacy Statement For Our Customers

*Accessed May 2018, revised versions may be accessed on the *freetobook* website*

**Freetobook is booking software used by accommodation providers to enable their customers to make online bookings and manage those bookings.**

This document applies to the processing by *freetobook* of personal data collected by properties using *freetobook* online booking system in relation to the provision of accommodation by those properties.

### 1. Your Personal Data

Properties using freetobook as their booking engine, collect and store information that you give when you make a booking. You are asked for your name, address, telephone number and email along with payment information and “the names of any guests travelling with you”. This may also include your IP address. This information is stored in the freetobook System in order to process your booking. You may be contacted by the Property you have booked with in relation to your booking.

Your data is also stored after you have stayed but will be kept no longer than necessary in order to comply with legal obligations and for properties to welcome your repeat business.

## 2. **Data processed directly by third parties**

If you provide payment information, this will be processed directly by secure PCI Level 1 compliant payment gateway providers.

## 3. **Joint Controllers**

In the context of providing booking software to accommodation providers to facilitate online booking, freetobook and the accommodation provider shall together operate as joint data controllers for the processing of your personal data.

## 4. **Security Procedures**

In accordance with General Data Protection Regulation (GDPR), freetobook observes reasonable procedures to prevent unauthorised access and misuse of personal information. We use appropriate business systems and procedures to protect and safeguard any personal information given to us. We also use security procedures and technical and physical restrictions for accessing and using the personal information on our servers. Only authorised personnel are permitted to access personal information in the course of their work.

## 5. **Control of your Personal Data**

You have the right to access data that is stored on behalf of properties taking bookings via freetobook system. You need to email or write to the property you booked with to request an overview of your personal data.

You can also contact the property you booked with on freetobook System if you believe that the personal information they have for you is incorrect, if you believe that they are no longer entitled to use your personal data or if you have any other questions about how your personal information is used or about the Privacy Statement. You need to email or write to the property you booked with.

## 6. **Reviews**

You may also be asked to send feedback after your stay in order for the property to further improve their service. Your email address will be used for this purpose. If you complete a review it may be posted on the property website, facebook page, twitter or google plus. However, no identifying details will ever be attached to a review posting.

**To Process your information as described above, we rely on the following legal bases:**

**Performance of a contract.** The storage of your information may be necessary to perform the contract that you have with the accommodation provider you are booking

with.

**Legitimate Interests.** We may use your information for our legitimate interests, such as for administrative, fraud detection and legal purposes.

## **Cookies**

A cookie is a small amount of data that is placed in the browser of your computer or on your mobile device. These cookies are used only to help you make a smooth booking and contain information like the date searched and language of booking. There is a difference between session cookies and persistent cookies. Session cookies will only exist until you close your browser. Persistent cookies have a longer lifespan and are not automatically deleted once you close your browser. We use persistent cookies in Google Analytics to analyse visitor traffic and behaviour.

By using freetobook website or proceeding with a booking you are consenting to the above use of cookies.