



## **Cwtch@Hafod Privacy & Information Security Policy**

### **About this policy and who we are**

Welcome to Cwtch@Hafod Limited privacy and information policy.

We are Cwtch@Hafod Limited (a company registered in England & Wales, company number 10930970) and trade as “Cwtch@Hafod”

All references to “we” “our” “us” or “company” within this statement or within any opt-in notices are deemed to refer to Cwtch@Hafod Ltd trading as Cwtch@Hafod.

Our registered office is 36 High Street, Pwllheli and our ICO Reference number is ZA668685. We are committed to protecting and preserving your privacy and personal data when you visit our website or communicate with us electronically (regardless of where you visit it from), and this policy explains how we collect, use, share and protect your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

The Data Controller Representative is Dr Gaynor E Lloyd-Davies. If you have any questions about this privacy policy or our privacy practices, please contact our Data Controller Representative on 01248 430202

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)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance

We are responsible for the collection and proper management of any personal information you submit. We will keep your personal details secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Policy. We are also legally obliged to use your information in line with current legislation covering the protection of personal information, including the Data Protection Act 1998.

This policy covers guests who use our company website to book a holiday or look for a holiday with Cwtch@Hafod. Please note that our customers must be over the age of 18.

We monitor and review our privacy policy regularly and will publish any changes on this web page. This policy was last updated on 15 June 2020. By using the website, you agree to be bound by this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **Personal information we collect**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you and in running and operating the website, we may collect and process the following information:

- Identification: name, title, date of birth, age/age range, gender, location
- Contact details: postal addresses, phone numbers, email addresses
- Account login details: email address, password (which is stored in encrypted form)
- Bookings: property booked, holiday check in/check out dates, cost of the holiday, amounts paid, limited details of other people booked on the same holiday (names, gender, age range)
- Marketing preferences: whether you wish to receive marketing information from us, and if so, by which methods (post, email, telephone, SMS)
- Payment: method, the last four digits of card numbers, payment card expiry date, amounts collected, third party payment service provider references. Please note that we do not capture or store your full card details: payment is handled by our payment service providers (see below)
- Browsing: historical searches, how you use our website and mobile apps, website experience user survey responses, the devices and IP addresses you use to access our services (operating system, browser). We collect this information so that we can continuously improve our website and our service to you
- Holiday experience: any feedback you leave, responses to customer satisfaction surveys, whether you have a pet, interests (e.g. preferred holiday type such as dog friendly cottages)
- Communication: recordings of your phone conversations with our staff (if applicable and generally only for staff training purposes), web chat messages, emails, customer service matters, responses to questionnaires, competition entries, your interaction with our marketing communications (clicking links in our marketing emails, for example – we track this to help ensure our communications are relevant and interesting)

Electronic identifiers: cookies, IP addresses. These electronic identifiers are essential to enable you to log into your online account and to assist you if you encounter difficulties using our online services. You can disable cookies if you wish, but this will hamper our ability to provide online services securely.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### **How we collect personal information**

We will only use your personal data when the law allows us to. Most commonly, we will collect information in several ways, as follows:

- From you - via the completion of forms on our website, or through contact via e-mail, social media, phone or in person
- Your use of our website
- Third party holiday providers you may book with, who advertise our properties
- Your interaction with our marketing communications
- Third party review services including Trip Advisor
- Like many companies, when you visit our website, we also collect information about usage via cookies, and we also track user and traffic patterns; however, we do not collect personal information via cookies. More information on our use of cookies is detailed below.

### **How we use your personal information**

#### **What personal information does Cwtch@Hafod hold?**

Our booking system is via Bookalet, held on a server hosted with Rackspace and cannot be accessed by any third party. We collect and use the information about people we deal with, only as part of our business process and functions. This takes the form of any information used to make up any booking or transaction, carried out between you and us in relation to [www.llanfairhall.com](http://www.llanfairhall.com) and Bookalet. In addition, we may occasionally be required by law to collect and use certain types of information to comply with the requirements of government departments. However no data is exported or supplied to any third parties for the purpose of advertising or promotional purposes. We collect the following information necessary for making a booking with us:

- name
- contact information including postal and email addresses as well as contact telephone number(s)
- other information provided necessary to making a booking, e.g. number of children, pets etc.

We require your personal information to understand your needs and provide you with a better service and in particular for the following reasons:

- Internal record keeping
- We may use the information to improve our products and services
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail. We may use the information to customise the website according to your interests.

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, in line with Bookalet, our booking system, there exist suitable physical, electronic and managerial procedures to safeguard and secure the information collected online.

If you decide that Cwtch@Hafod should not keep any of your contact details, then upon written request, we will delete all references to you and confirm to you that this has been done.

We will take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Of course, data transmission over the internet is inherently insecure and we cannot guarantee the security of data sent over the internet.

For information on the way that Cwtch@Hafod protects personal information sent to external organisations, contact [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com) via email or in writing to:

Data Protection Officer, Cwtch@Hafod, Brynsiencyn, Llanfairpwllgwyngyll, Anglesey LL61 6SZ.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Controlling your personal information**

Please note that we will not provide any of your information to any third parties. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com) .

You may request details of personal information which we hold about you, if you would like a copy of the information held on you, please email us at [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com) .

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

We use your personal information to:

- Manage your holiday booking
- Manage your online account
- Understand how to improve our services, to select and advise upon the best holiday properties to match your requirements and to provide the most relevant information and offers to you
- Detect and prevent fraud or abuse of our services
- Enable the display of the most appropriate adverts on our websites and on other websites and services where we place advertising
- Communicate with you, including responding to your emails, messages on social media, web chat requests and handling customer service issues
- Process your payments
- With your permission, send you relevant marketing information such as details of special offers and new properties we think will be of interest to you
- Manage competitions, promotions and special offers in which you participate
- Make sure our servers and websites are operating correctly

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Data Controller Representative on 01248 430202

## **Legal basis of processing**

There are several grounds on which we will store and use your data, as follows:

- Consent: for certain types of data processing (e.g. marketing activities), we rely on your consent to use your data. You may withdraw your consent at any time (see Your rights below)
- Bookings: much of the time, our use of your data will be because of the holiday booking we manage on your behalf. We will usually retain relevant data for up to six years from the date the booking completes - usually the last day of your holiday
- Legal obligations: we are under certain binding legal obligations, such as accounting to the government for tax and making financial records available for audit. In such cases, we are typically obliged to retain data for up to seven years from the date of the transaction
- Legitimate interests: we use data to manage our operations and to make business process improvements. However, we will always ensure that our legitimate interests will never override your right to privacy.

## **How we share your personal information**

We give some of your contact information to housekeepers, so they can get in contact with you regarding, for example, key collection. (We also give you their contact details, for the same reason).

However, we would note the following:

- We store your data in certain cloud services provided by third parties. Those third parties do not however have access to your data.
- We do not transfer your data outside the UK or the European Union

Any personal information we collect is only used by Cwtch@Hafod. We do not share personal data with any other third parties, other than noted above, unless we are required to do so by law.

## **Security of your data**

We 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, we 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 our instructions, and they are subject to a duty of confidentiality.

We 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 we are legally required to do so.

We protect your data with various technology-based systems. We also regularly test and evaluate the security of our systems, updating safeguards as necessary. Our staff are trained in the importance of security and privacy and we treat breaches of confidentiality and privacy as disciplinary matters.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner.

## **Your rights**

We generally use your data either on the basis of your consent or as a result of a holiday booking which you have placed with us. You have the right to withdraw your consent. All of our marketing communications include an unsubscribe link, to make it easy to withdraw consent. If you have an online account with us, you may also log into our website to manage your marketing preferences.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you are concerned about the processing of your data, please contact [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com). If you are unhappy with our use of your data, you also have the right to make a complaint to the Information Commissioner's Office, which supervises data protection in the UK.

At any time, you have the right to ask us:

- to confirm whether we hold any of your personal data
- to send you a copy of any personal data that we hold about you
- to correct any inaccuracies in your personal data and to add relevant details where the personal data we hold is incomplete
- to delete (to the extent possible) any of your personal data, where we are required by law to do so
- to stop processing your personal data, where we are required by law to do so
- to let you have a portable copy of the personal data we hold about you, where we are required by law to do so
- to stop processing any of your personal data that we process on the basis of our legitimate interests
- to stop sending you marketing material

Please note that when these rights are exercised, we will conduct identification checks in order to ensure your privacy is safeguarded. You will need to contact us by email or post, to exercise these rights. We try to respond to all legitimate requests within 1 month of the request being made. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

### **Marketing Opt-Outs**

You may opt-out of receiving marketing communications from us by contacting us at any time by emailing us at [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com) or in writing to the Cwtch@Hafod Ltd Data Controller Representative at Griffith, Williams & Co, 36 High Street , Pwllheli or by calling 01248 430202 and asking to speak to the Data Controller Representative.

You can also opt out of certain marketing communications through the following means:

- **Email:**  
By following the unsubscribe link at the bottom of each marketing email or updating your preferences in your account (where applicable). Please note that if you do opt out, you may still be sent non-marketing messages, such as booking confirmations or balance reminders that would be relevant to the service we are providing to you.
- **Post:**  
By following instructions from within the mailing itself or sending back to the sender address
- **Advertising on third party websites:**  
You can opt out of personalised marketing from us on third party websites or apps by visiting the following links:  
Google: <https://support.google.com/ads/answer/2662922>  
Facebook: <https://www.facebook.com/ads/preferences>

Please remember that if you change your preference it may take a short time for those preferences to become effective.

### **Cookies**

To comply with EU legislation that was introduced in May 2012, this section documents how our website might collect information from you.

‘Cookies’ are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies are sometimes used to improve the website experience of a visitor to a website. They collect statistical data about your browsing actions and patterns but do not identify you as an individual. For example, we may use cookies to pre-fill some information on forms or to enable us to see what people view on the website and for how long. The use of cookies enables us to improve our website, deliver effective marketing and offer a more personalised service.

Cookies contain information that is transferred to your computer’s hard drive and then stored there and transferred to us where appropriate to help us to improve our website and the service that we provide to you. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. However, if you use your browser settings to block or refuse cookies you may not be able to access all or parts of our site.

You can find more information about the individual cookies we use and the purposes for which we use them by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Cookies for Site tracking**

### **Google Analytics**

To enable us to monitor the usage of our website and the success of our marketing, we use Google Analytics, which uses a variety of cookies. These are used to track visitors and collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

For information on the cookies used by Google Analytics please visit <https://support.google.com/analytics/answer/6004245>

### **Payment service providers**

In order to ensure your transactions are as secure as possible, we use the following company to process all card payments:

[PayPal UK](#)

### **Any Questions?**

If you have any queries regarding any matters noted above, please do not hesitate to call the Data Controller Representative on 01248 430202 or by emailing [cwtchathafod@btinternet.com](mailto:cwtchathafod@btinternet.com) .