# **Inspire Stays Ltd Privacy Notice**

#### INTRODUCTION

Inspire Stays Ltd are committed to protecting and respecting your privacy. This privacy notice sets out the ways in which we may collect and process your personal data, and your rights in respect of the personal data that we hold about you. This privacy notice applies in relation to information we collect through the use of our website www.inspirestays.com, in correspondence or otherwise.

For the purpose of UK and EU data protection law, the data controller is Inspire Stays Ltd, registered in England and Wales under company no. 13878468 (referred to as "we", "us", or "our" in this privacy notice). If you would like to contact us in connection to this privacy notice you may write to us at:

Inspire Stays Ltd 1 St James Works St Pancras Chichester PO19 7NN

By providing us with your data you warrant to us that you are over 13 years of age. It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by writing to us at the above address.

#### INFORMATION WE COLLECT

If you choose to make a booking through us or make enquiries about a potential booking, including filling out forms on our website, by corresponding with by phone, email or otherwise, we will collect details that you provide in relation to that booking or enquiry. Information held is likely to include your name, contact details, payment details, date of birth, information about people travelling with you, information about your booking and any additional information we may need to help meet your specific requirements.

If you choose to let your holiday accommodation with us we will collect details such as your name, contact details, bank account details and details regarding the accommodation you wish to let including access data and Health and Safety information such as insurance, gas and electrical safety records.

# We may also collect:

Marketing and Communications Data - information provided to us when you subscribe to our mailing list, use our social media platforms, enter a competition or promotion. This information may include your preferences in receiving marketing communications from us and third parties and your communication preferences.

In order to personalise your website experience and understand how people use our website, we may also gather information about the devices you use and your use of our website. This may include the following:

- Technical data which may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- Usage data about your use of our website such as referral source, length of visits to certain pages, page views, website navigation paths, items viewed or searched for, page response

times, download errors, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from pages.

#### SENSITIVE DATA

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health (unless you choose to provide us with this information to ascertain the suitability of a specific property) and genetic and biometric data. We do not collect any information about criminal convictions and offences.

# HOW WE COLLECT INFORMATION

We may collect data from you when you make a booking or enquiry via our website (including online forms), by phone, email or social media. We may also collect your data from another traveller in your party. We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our Cookie Policy for more details about this.

We may receive data from third parties such as analytics providers, advertising networks, search information providers such as Google based outside the EU, providers of technical, payment and delivery services. We may also receive data from publicly available sources.

# THE PURPOSES FOR WHICH WE COLLECT/PROCESS INFORMATION

We have set out below the purposes for which we process the information described in this notice and the legal basis we rely on for each processing purpose. UK and EU data protection law requires us to have at least one "legal basis" for processing personal data. The legal bases applicable to the personal data to which this notice relates are:

- Performance of contract: Where the processing is necessary for us to perform a contract that you are party to, or to take steps at your request prior to entering a contract.
- Legal obligation: Where the processing is necessary for compliance with a legal obligation to which we are subject.
- Legitimate interests: Where processing is necessary for the purposes of our legitimate
  interests or the legitimate interests of a third party, provided that your interests or
  fundamental rights and freedoms which require protection of your data do not override those
  legitimate interests.
- Consent: If you have given your consent to us processing your personal data for specified purposes.

Purpose of processing	Legal basis for processing
To enable us to complete your booking (if you are booking a holiday through us):  To enable us to complete your booking (if you are booking a holiday through our bookings platform), payment providers, and credit reference agencies who we use to assess fraud, credit and/or security risks, if applicable. International Transfer: Where information is transferred outside of the EEA, we ensure that appropriate safeguards are in place to protect your information to the same or an equivalent level as would be found in the UK and EU data protection legislation.	Performance of contract  Legitimate interests (protecting our business from risk)
To manage customer service queries; and to help us to provide details or information you may have requested.	Legitimate interests (protecting our business from risk)  Legitimate interests (providing a high standard of customer service and experience)
To enable us to advertise your holiday accommodation, transfer payments due to you and to provide related support services including housekeeping (if you are letting your holiday accommodation through us).	Performance of contract
To share your contact details with our third-party review administrator(s) who may contact you to ask for your comments on the accommodation and/or services that have been provided.	Legitimate interests (providing a high standard of customer service and experience)
To contact potential owners of holiday accommodation in order to send a property appraisal.	Legitimate interests (promoting our brand, products and services)
To send you marketing communications about our products and services which we think may be of interest to you subject to your marketing preferences	Consent (as indicated by preference tool)  Legitimate interests (promoting our brand, products and services to increase sales)

To share your email address with our technology providers including Google, Meta, Pinterest and others (data processors) for them to use on our behalf in connection with the creation of relevant advertising on our website and other websites (depending on your cookie preferences)	Consent (as indicated by website visitors using our cookie preference tool)
To ensure that content from our website is presented in the most effective manner for you and for your device (depending on your cookie preferences)	Consent (as indicated by website visitors using our cookie preference tool)
To measure or understand the effectiveness of web advertising we serve to you (depending on your cookie preferences)	Consent (as indicated by website visitors using our cookie preference tool)
For our own legal and risk management and insurance purposes	Legitimate interests (protecting our business from risk)  Legal obligation, when necessary to ensure our business complies with applicable laws

#### WHO WE SHARE YOUR INFORMATION WITH

We work with a number of trusted service providers, suppliers, agencies and businesses in order to provide you with the highest standard of products and services. Some of the categories of third parties whom we share the information described in this notice with are:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Service providers who provide services to us in connection with publishing and running our website and providing the services and functions available via our website.
- Service providers who provide software and/or professional services in connection with running our business.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.
- Other third parties if we are under a duty to disclose or share your personal data in order to
  comply with any legal obligation, or in order to enforce or apply the terms of any agreement
  or policy to which we are a party, or to protect the rights, property, or safety of us, our staff
  or customers, or others. This may include exchanging information with other companies and
  organisations for the purposes of fraud protection and credit risk reduction.

# HOW WE STORE YOUR INFORMATION

Information that you share with us is kept strictly confidential and secure. Your encrypted (encoded) information is protected using "Secure Socket Layers (SSL)" as it passes between your browser and this website. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. Only authorised persons are permitted to access your personal information. All authorised persons must abide by security, privacy, and confidentiality agreements, rules and laws.

#### IF OUR BUSINESS IS SOLD:

If we sell or buy any business or assets, we will provide your personal information to the seller or buyer. This is only to the extent we need to, and in accordance with data protection legislation. If we or the majority of our assets are acquired by a third party, the personal information held by us will be transferred to the buyer.

We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, you may write to us at the address above, in which case the relevant seller or buyer of our business may not be able to provide services to you.

# INTERNATIONAL TRANSFERS

We may from time to time transfer your data outside of the UK. Where we transfer your data outside the UK, we will ensure there is an adequacy decision in place or enter into standard contractual clauses to ensure your personal data is adequately protected. For details of the transfer mechanism in place, please contact us.

#### **DATA SECURITY**

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 such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

# **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner.

# YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, please put this in writing to us at Inspire Stays Ltd, 1 St James Works, St Pancras, Chichester, PO19 7NN.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

#### THIRD-PARTY LINKS

This website includes 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 notice of every website you visit. We do not accept any responsibility or liability for these policies or websites. Please check their policies before you submit any personal information to these websites.

#### **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy below.

#### **DISCLAIMER**

Whilst we use all reasonable efforts to ensure that the information published on this website is accurate, current and complete at the date of publication, no representatives or warranties are made (expressed or implied), as to the accuracy, currency or completeness of such information. We cannot accept responsibility (to the extent permitted by law) for any loss arising directly or indirectly from the use of, or any action taken in reliance on, any information appearing on this website or any other website to which it may be linked. We make no warranty that this website is free from errors, defects or viruses. We reserve the right to change or modify this policy and any changes will be shown here.

# **COOKIE POLICY**

A cookie is a small text file containing an identifier (a string of letters and numbers) that is sent by a website server to your browser when you visit a website and is stored in your browser. The identifier is then sent back to the website each time your browser requests a page from the website server. When you return to the website, the website can access its previously placed cookie to uniquely identify your browser.

Cookies do several different things. They recall your preferences on a website, help you view content more efficiently and improve the overall user experience on a website. They can also help advertisers see what interests you and what advertising may be relevant to you.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies can be set by the website operator (known as 1st party cookies) or third parties such as advertisers, social media platforms and analytics service providers (known as 3rd party cookies).

Cookies may not contain any information that directly personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org/.

#### COOKIES WE USE ON OUR WEBSITE

We use cookies on our website for a number of different purposes. The categories of cookies we use are:

- Strictly Necessary Cookies: These cookies are essential for you use this website and its features.
- Performance Cookies: These cookies enable us to monitor and improve the performance of the website.
- Functional cookies: These cookies allow this website to remember choices you make. For example, this can be the last date you've searched for or the last holiday you've viewed.
- Targeting or advertising Cookies: These cookies used to deliver adverts relevant to an identified machine or other device (not a named or otherwise identifiable person) which are tailored to interests associated with the website activity tied to that machine or device. These cookies are also used to limit the number of times a user sees an advertisement as well as to help measure the effectiveness of the advertising campaign. They may also remember that this website has been visited from a device and share that information with marketing organisations. The marketing cookies on this website are operated by third parties with our permission. Marketing cookies are used to monitor from which advertising source a user was directed towards our website, so that we know whether it is worth us investing in that particular advertising source.

#### THE COOKIES WE SET

- Email newsletters related cookies
  - This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.
- Orders processing related cookies
  - This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.
- Surveys related cookies
  - From time to time we offer user surveys and questionnaires to provide you with interesting insights, helpful tools, or to understand our user base more accurately. These surveys may use cookies to remember who has already taken part in a survey or to provide you with accurate results after you change pages.
- Forms related cookies
  - When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.
- Site preferences cookies
  - In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

### THIRD PARTY COOKIES

We also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

• This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the

- site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.
- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.
- As we sell products it's important for us to understand statistics about how many of the
  visitors to our site actually make a purchase and as such this is the kind of data that these
  cookies will track. This is important to you as it means that we can accurately make business
  predictions that allow us to monitor our advertising and product costs to ensure the best
  possible price.
- The Google AdSense service we use to serve advertising uses a DoubleClick cookie to serve
  more relevant ads across the web and limit the number of times that a given ad is shown to
  you. For more information on Google AdSense see the official Google AdSense privacy FAQ.
- We may use adverts to offset the costs of running this site and provide funding for further development. The behavioural advertising cookies used by this site are designed to ensure that we provide you with the most relevant adverts where possible by anonymously tracking your interests and presenting similar things that may be of interest.
- Several partners advertise on our behalf and affiliate tracking cookies simply allow us to see if our customers have come to the site through one of our partner sites so that we can credit them appropriately and where applicable allow our affiliate partners to provide any bonus that they may provide you for making a purchase.
- We also use social media buttons and/or plugins on this site that allow you to connect with
  your social network in various ways. For these to work, the social media sites including
  Google, Meta and Pinterest will set cookies through our site which may be used to enhance
  your profile on their site or contribute to the data they hold for various purposes outlined in
  their respective privacy policies.