

Privacy Policy

Name: Vikki Douel – Pippins Holiday Cottage

Property: Pippins Holiday Cottage

Date Completed: August 2025

1. Introduction and important information

Pippins Holiday Cottage (“we”, “us” or “our”) are committed to protecting and respecting your personal data and privacy.

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

Please note that:

- Our website is not intended for children under the age of 18 and we do not knowingly process personal data relating to children; and
- Our 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.

Whenever you provide personal data, we are 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 our 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 we are and how to contact us

- 2.1 For the purpose of the Data Protection Laws, the data controller is Pippins Holiday Cottage. We operate as a partnership and our main business address is Pippins Holiday Cottage, Neuadd Farm, Penybont, Llandrindod Wells, LD1 5SW. If you have any questions about this privacy policy or want to request information about how we process your personal data, please contact us using the details below:

FAO: Privacy Officer – Vikki Douel

Pippins Holiday Cottage, Neuadd Farm, Penybont, Llandrindod Wells, LD1 5SW

United Kingdom

Email: pippinscottage@gmail.com

Telephone: **07979324114** 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. The data we collect about you

- 3.1 We collect and process personal data. Typically, the personal data we 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
 - 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, Automatic Number Plate Recognition and other surveillance technologies installed at the Property. (See CCTV Policy)
 - 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 IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, platform and other technology on devices you use to access our website
 - 3.1.7 **Profile Data** Includes your booking history with us, any preferences you've expressed, and any feedback response we may have received
 - 3.1.8 **Usage Data** Includes information about how you use our website, booking platform, social media channels or property facilities
 - 3.1.9 **Marketing and Communications data** includes your preferences in receiving marketing from us and your communication preferences (e.g. email)

Please note that we may collect and/or process other personal data from time to time. If we 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 **Aggregated Data**

We may collect summary or statistical data from our bookings or website (such as how many people book in summer months). This type of data does not personally identify you and is only used to help us improve our services.

3.3 We 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, we will collect the health information we need to provide special assistance services requested under the booking or where we need to record and report an incident or accident occurring at the Property. Nor do we collect any information about criminal convictions and offences.

3.4 We 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 we hold about you is accurate and current. We cannot be held responsible for any inaccurate or incomplete data on our system arising out of your default in this regard. Please keep us informed if your Personal Data changes during your relationship with us.

4. **How is your personal data collected?**

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

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

- (a) book our Property;
- (b) subscribe to our additional service(s);
- (c) request marketing to be sent to you; or
- (d) give us feedback or contact us

4.1.2 **Automated technologies or interactions.** We may also collect your Technical Data about your equipment, browsing actions and patterns when you visit our website. We collect this personal data by using cookies and other similar technologies.

- 4.1.3 We may collect your CCTV Data and Usage Data through surveillance systems installed at the Property in accordance with our CCTV policy.
- 4.1.4 **Third parties or publicly available sources.** We may receive personal data about you from the following sources:
 - (a) **Technical Data** from analytics providers, such as Google Analytics, which collect data on how visitors use our website to help us improve our services.
 - (b) **Contact, Financial, and Transaction Data** from payment service providers that facilitate your bookings or payments on our site.

5. If you fail to provide personal data

Where we need to collect certain personal data by law or to fulfill a contract we have with you (such as a booking), and you do not provide that data when requested, we may not be able to provide you with our services. In that case, we may need to cancel part or all of your booking, but we will let you know at the time if this happens.

6. How your data will be used

6.1 We use the information we hold about you to:

- 6.1.1 Fulfill our obligations under any contracts between you and us, and to provide our services — including any third-party services we may offer (such as recommendations or booking extras);
- 6.1.2 Request feedback and carry out research to help us improve our services; and
- 6.1.3 Inform you about any updates or changes to our services.

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

6.3 We may share your personal data with third parties where we are legally required to do so, or where we have a valid lawful basis for doing so, as outlined in the table below (see also clause 7). We may also process your personal data without your knowledge or consent where this is required or permitted by law.

6.4 We have set out below, in table format, a description of the ways in which we plan to use your personal data, along with the legal bases we rely on to do so. Where relevant, we have also identified our legitimate interests. Please note that we may process your personal data under more than one legal basis depending on the specific purpose for which we are using

your data. If you would like further details about the specific legal basis we are relying on in any particular case, please contact us.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a guest or visitor of the Property (including vehicles).	Identity	Performance of a contract with you;
	Contact	
	Usage	Legitimate interests (to ensure unauthorised visitors do not attend or occupy the Property)
To provide our self-catering accommodation and related services to you, including processing bookings and payments.	Identity	Performance of a contract with you; Legitimate interests (to recover debts due to us)
	Contact,	
	Transaction	
	Usage	
To provide special assistance at the Property, where requested.	Marketing / Communications	
	Identity	Explicit consent
	Contact	
To manage our relationship with you, including changes to our terms or policy and requesting feedback or reviews.	Health (Special Category Data)	
	Identity	Performance of a contract with you;
	Contact	Legal obligation;
	Profile	Legitimate interests (to keep records updated and understand service use)
To keep the Property and guests secure (e.g. via CCTV).	Marketing / Communications	
	CCTV	Necessary for our legitimate interests (to keep our Property secure and ensure the wellbeing of guests and contractors while at the Property).
	Usage	A copy of our Privacy Impact Assessment (PIA) in relation to our use of the CCTV system

		is available on request.
To record and manage incidents or accidents at the Property.	Identity	Legal obligation (health & safety); Legitimate interests (to resolve complaints and ensure guest safety); Legal defense rights;
	Contact	
	Usage	
	Health (Special Category Data)	
To administer and protect our website and business (e.g. troubleshooting, maintenance, fraud prevention).	Identity	Legitimate interests (IT services, network security, preventing fraud);
	Contact	
	Technical	Legal obligation
To understand effectiveness of any advertising or promotional efforts.	Identity	Legitimate interests (to improve marketing and understand user engagement)
	Contact	
	Profile	
	Usage	
	Technical	
	Marketing / Communications	
To use data analytics to improve our website, services and customer experience.	Technical	Legitimate interests (to define customer types, update our website, develop services)
	Usage	
	Profile	
To occasionally inform you of availability, offers, or seasonal updates related to our accommodation (only if you have given consent).	Identity, Contact, Technical, Usage, Profile, Marketing and Communications	Legitimate interests (to grow the business and tailor service offerings)

7. Lawful basis for processing

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

7.1.1 **Contractual obligation** – this means processing your personal data where it is necessary for us to fulfill our obligations under a contract we are about to enter into, or have entered into, with you. For example, if you book accommodation or services with us, we will use your personal data to process and deliver those services.

7.1.2 **Legitimate interest** – Means the interest of our business in managing and operating effectively to provide you with the best and most secure experience. We carefully consider and balance any potential impact on your rights before we process your personal data for our legitimate interests. We rely on this lawful basis when the processing does not, in our opinion, override your rights or freedoms and is proportionate to our interests — for example, keeping our property secure through CCTV, maintaining records of bookings, or occasionally contacting you for feedback or relevant updates.

7.1.3 **Consent** – We will seek your consent before processing your personal data when:
(a) the processing is not necessary for fulfilling a contract with you and we have not identified another valid lawful basis (such as a legitimate interest); and
(b) we need to process any special category data (for example, health information you provide in relation to accessibility or special assistance needs).

You have the right to withdraw your consent at any time by contacting us using the details in this policy.

7.1.4 **Legal obligation** – We may process your personal data when it is necessary for us to comply with a legal obligation.

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

7.2.1 **Vital Interests** – processing is necessary to protect your or someone else's life (for example, in a medical emergency); 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 We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we 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 we instruct.

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

Service providers who may receive your personal data	Location	Notes/ Purpose
IT Support Services	UK	For website and system maintenance and troubleshooting
Email Provider	UK / EEA / Outside UK & EEA	For sending transactional and marketing emails
Website Provider	UK / EEA / Outside UK & EEA	Hosting and managing the website
Banks	UK / EEA	For handling payments and refunds
Online Payment Providers	UK / EEA / Outside UK & EEA	For handling payments and refunds
Accountants	UK	For financial records and tax purposes
Insurers	UK	For Insurance related data
Solicitors	UK	Legal advice and compliance
Feedback collectors	UK / EEA / Outside UK & EEA	To collect and analyse guest feedback
Couriers	UK	To send back any guests

		belongings they may have left or any deliveries relating to bookings or services
--	--	--

8.3 We may disclose your Personal Data to any competent law enforcement body, regulator, 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.

8.4 We may also be required to share your Personal Data as part of any sale, transfer or merger of our 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 our position as Data Controller under clause 2.1.

9. Information security

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

10. Marketing

10.1 We may use your Identity and Contact Data to send you occasional marketing communications about our services, but only if you have agreed to receive them.

10.2 You will only receive marketing communications from us if you have requested information or booked with us and have not opted out of receiving such communications.

10.3 Your Marketing Choices – We provide you with choices about marketing communications from us. You can ask us to stop sending you marketing messages at any time by following the opt-out link in any message or by contacting us directly.

11. international transfers

11.1 Your data is stored by us and our processors primarily in the UK. Some of our service providers, such as payment processors (e.g., Stripe) and booking platforms (e.g., Freetobook), may be based outside the UK or European Economic Area (EEA).

Whenever we transfer your personal data internationally, we ensure that appropriate safeguards are in place to protect your data to a standard equivalent to UK data protection laws. This includes transferring data only to countries approved as providing an adequate level of protection or by using standard contractual clauses and other approved mechanisms.

11.2 Whenever we transfer your personal data to countries outside of the UK and/or European Economic Area ('EEA'), where we use certain service providers (see clause 8.2), we 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, we will ensure that we 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 us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

12. Data security

12.1 We have implemented appropriate technical and organisational measures to protect your personal data from accidental loss, misuse, unauthorized access, alteration, or disclosure. Access to your personal data is strictly limited and controlled to ensure it is only used for legitimate purposes in line with this policy.

12.2 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.

13. Data retention

13.1 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.

13.2 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.

13.3 By law we have to keep basic information about our 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).

14. Your rights

14.1 Under the data protection laws your rights are:

- 14.1.1 **To be informed** – We must make this privacy policy (sometimes referred to as a privacy notice) available to you and be transparent over how we process your data.
- 14.1.2 **Access** – You are entitled to know what details we hold about you and why. We strive to be as open as we can be in terms of giving people access to their personal data. You can find out if we 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 we do not hold information about you we will confirm this in writing at the earliest opportunity. If we do hold your personal data we will respond in writing. Our 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; and
 - (e) let you have a copy of the data in format we deem suitable or as reasonably required by you
- 14.1.3 **Rectification** – We are obliged to correct or update your details. We 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 we may still be allowed (or required) to process your personal data if we can show you that we have a compelling reason for doing so.
- 14.1.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.
- 14.1.9 **Withdraw consent.** Where you have given us 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. We do not penalise individuals who wish to withdraw consent and we act on withdrawals of consent as soon as we can.

14.2 Please note that:

- 14.2.1 in certain circumstances Data Protection Laws may relieve us of some of our obligations to you under the rights summarised above; and
- 14.2.2 you may need to provide identification in order 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, we 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

We keep our privacy policy under regular review. This version was last updated on (August 2025).