

Privacy Policy

This Policy is applicable to both parties, depending on your location and contract, one party will be responsible.

We, **Great Holiday Rentals Abroad Ltd**, of Halefields Colne Road Somersham, Huntingdon PE28 3DQ UK are the Controller of your data. Contact Privacy@sunandsnowinspain.com

Or

Linda French, Halefields Colne Road, Somersham, Huntingdon, Cambs, PE28 3DQ, is a Controller of your data. Contact Privacy@sunandsnowinspain.com

It will be clear in your contract who is providing the service and responsible for your personal data.

Note: For Slovenian Properties, Linda French (who is holder of the tourist licence in Slovenia and acting as landlady) of 105 Volce Tolmin Slovenia 5220 is a Controller for any data where there is a legal obligation to collect and disclose information to the Slovenian authorities

Note: For UK short and long term rentals, Linda French will be the Controller of your data

Why do we collect your data?

When we rent our houses or rooms to you, we need verify that we are renting to the right persons, both meeting our legal obligations, as well as protect our property. Some of the details we collect are under a legal obligation by the local country so they know who has entered the country and where you are staying.

We also collect data if you have given your consent for cookies so that we can analyse your use of our site to improve your experience on our site.

What data do we collect?

Your booking details

Name, address, dates of booking, arrival and departure times, house booked, amount paid, telephone number and email address, bank details.

Details of any CCI's and insolvencies, and your ability to pay rent, as well as any information supplied in relation to your suitability to rent our properties (6+ month rentals only).

Your identity details

Name, address, Passport/ID document reference and type, Issuing authority, place of birth, nationality, date of birth, ethnicity.

Your reviews

Anything you say in a review to be made public – however, these reviews will be published in an anonymous way, so once published they will not be subject to privacy laws.

Property photos

We will at our choice, take photos before and after your rental, or indeed during your rental if there is a need to support our legitimate interests in protecting our assets, as well as protecting others where facilities are shared.

Tenant Reference Check Details – UK Only

Where we carry out reference and or credit checks **before** your tenancy, we will process this data with your Consent, the details include your employment and income, previous landlord contact details, bank account details, previous addresses, bank statements, and any other data that a tenant reference and credit agency will provide in order to carry out those checks.

In order to protect our assets, including keeping control of any debts you have with us, we may also carry out credit checks during and after your tenancy. It is in our legitimate interests to do this, which includes keeping our costs down as part of our process of collecting any debts, which in turn helps us keep our rental prices reasonable.

We are obligated to carry out “Right to Rent” checks with the government, and will process any passports/settlement letters and any other proof that may be required by law.

Utility Consumption

Water, gas and electricity consumption by unit KWH and litres, date, time, metre readings, unit, electrical compliances.

Cookie data – website only

- **Device Information.** Information about Your device, including hardware model, operating system and version, device name, mobile network information, and information about the device’s interaction with our website such as pages viewed and click throughs.

CCTV Footage

Slovenia – this is captured when you check in and check out (at the front door only). This remote check in provides evidence of the dates and times of of check in and check out, with that information being provided to the local policy.

UK rentals @ Halefields

CCTV covers all front doors, and the driveways and garden at Halefields UK. This is to ensure the protection of the home and family of Linda French

Where do we collect your data from?

We collect this data directly from you, for yourself, or from you on behalf of the persons travelling in your group. You must ensure that this Privacy Policy is made available to members of your group and you have their permission to share their details.

We collect data from tenant and credit reference agencies to check you are suitable to rent our properties (where you are renting for 6+ months), and managing any debts that you create with us.

We collect data from your previous landlord if you have provided details in order for us contact your previous landlord for a reference.

If you have made a request via a booking portal, that portal shares your contact details with us. We have no control over the data the portal, that you sign up to processes your data.

We collect data from CCTV footage to provide a) evidence of check in date and times (Slovenia), b) protection and security of the family and home for Halefields UK.

Lawful basis and retention period

| <u>Purpose</u> | <u>Lawful Basis</u> | <u>Data Processed</u> | <u>Retention period</u> |
|---|---------------------|---|--|
| To make a reservation and stay at one of our houses | Legitimate Interest | Your booking details | 12 months from the end date of your stay |
| To check your suitability to rent our properties (Tenant Referencing and credit checks) | Consent | Your Identity Details Tenant Reference Check Details | During the period of your tenancy, plus 12 months after the contract ends. |

| | | | |
|--|--|------------------------------------|--|
| To fulfil tax and accounting legal obligations | Legal Obligation | Any or all of your booking details | 6 years + end of tax year to comply with UK Tax and Accounting rules + 10 years for Spain |
| | Legal Obligation | Any or all of Your booking details | 10 years to comply with Slovenian Tax rules & Slovenia |
| To comply with local country legislation on identifying your right to rent (border control) | Legal Obligation | Your identity details | Slovenia – Calendar Year + 12 months Spain – 24 months UK – 6 years |
| To monitor utility consumption (UK 6+ months rental only) to help us comply with our rental obligations | Legitimate Interest | Utility Consumption | Up to 6 years for expenses necessary for taxation and accounting. On a case-by-case basis where there is a dispute in relation to fair usage. |
| To defend any claims, protect our assets, and collect and control any debt you create with us (either during or after your tenancy). | Legitimate Interests | Any or all of the data listed | Decided on a case by case by basis if and when circumstances arise. |
| 1. Using cookies to help us improve your experience by providing insights into how the site is being used. (Not yet in use). | 1. Consent 2. Legitimate Interests for essential cookies that are necessary to ensure our website works | Cookie data – website only | 1. 13 months 2. 13 months |

| | | | |
|--|-------------------------------------|--|--|
| 2. Cookies to ensure our website works. | | | |
| To protect our family and home (includes CCTV footage) | Legitimate Interests | Any data that would be captured on our family premises, including at each door of rental units | 90 days, unless required longer on a case-by-case basis if any suspicious is recorded. |
| To protect the vital interests of you | Vital interests of the data subject | Any data relevant at the time of the event | On a case-by-case basis |

Where is your data stored?

Your data is processed in the UK.

If you give your data to Weebly in the US, your data will be processed by them in the US. This is optional and not part of our purposes of renting our houses to you.

Who do we share your data with?

To comply with legal obligations your identity details are shared with the police and the local tourism authority in the country in which our house is located.

To comply with UK Tax and Accounting, we would share your booking details with both HMRC (UK Tax Authority) and also the local Tax authority in which you are renting our house to comply with the tax rule in that country.

With any organisation on a case-by-case basis, as necessary to provide evidence in supporting protecting our houses, as well as ensuring the safety of others, and collecting any debts.

For tenant reference checks, we share 'Tenant Reference Check Details 'with a referencing agency who will perform the checks on our behalf'. Usually for the UK this will be www.NRLA.org.uk

We will share any and all of your data with the police, or any emergency services should the circumstances arise in ensuring there is no anti-behaviour (including drug dealing), or thefts, or in the event that it concerns your safety.

We will share any of your data on a case by case basis, with your next of kin or family member in circumstances where it is necessary to protect your welfare.

Cookies and Similar Technologies

As part of providing the website, we set essential cookies, these are cookies that are used to make sure our website functions and to ensure the security.

If you give consent, we may also use cookies to analyse how you use our website.

Withdrawing your Consent

To withdraw your consent to these analytical cookies, please remove the cookies set by sun and snow Slovenia from your browser using the information at www.allaboutcookies.org and do not re accept the setting of cookies again when you use the website.

To withdraw your Consent for other purposes, please email Privacy@suandsnowinspain.com

Your rights

- You have the right to request from us, details of the information we hold about you (this is called access to your data), as well as why we process (as detailed above).
- You have the right to request rectification of any details that we hold which are incorrect.
- You have the right to restrict/object processing if you feel that we are processing your data in a way not listed in this policy, or the information is inaccurate.
- You have the right to complain to the data privacy authority if you feel we are processing your data unlawfully. for the UK this is www.ico.org.uk tel 0303 123 1113.
- You have the right to request that we port (send) your details to another provider
- You have the right to request erasure; however, this right is not absolute and we cannot delete your data if we are required to retain it under a legal obligation.
- You have the right to object to processing of your data for marketing.

To complain to the Slovenian authorities:

+386 01 230 97 30

Last updated 13 October 2024