

PRIVACY POLICY

City Room Rentals respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or purchase goods from us. It will also tell you about your privacy rights and how the law protects you.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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Important information and who we are

We are Edinburgh Room Rentals Limited trading as City Room Rentals. We are a company incorporated and registered in Scotland. Our company number is SC484754. Our address is 7-11 Melville Street, Edinburgh, EH3 PE .

When we refer to “**we**”, “**us**” or “**our**” in this policy, we are referring to City Room Rentals. We are the data ‘controller’ in relation to the personal data you provide to us, which means we determine the purposes and the way in which your personal data is, or will be, processed.

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal so that you can be confident when you interact with us that you know what your personal data is being used for and that it is being kept safe. This covers the personal data we obtain in relation to our website at www.cityroomrentals.co.uk (“**Site**”) and in relation to our property booking services (“**Services**”).

It is important that you read this privacy policy together with any other privacy notice or fair processing notice 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 the other notices and is not intended to override them.

We use the following definitions in this policy to cover the different categories of individuals we interact with via our Site and Services:

- **Client:** means a third party entity which has entered into a contract with us for any of our Services;
- **Guest:** means an individual who books accommodation via our Site or who books accommodation from a Client for whom we are providing Services;
- **Registered User:** means an individual employee, contractor or agent of a Client who is authorised to register for use the Service by that Client, or an individual who is Client; and
- **User:** means any person accessing our Site.

Third-party links

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 one of our websites, we encourage you to read the privacy notice of every website you visit.

How is your personal data collected?

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

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us in person, by email, by phone, by post or otherwise. This includes personal data you provide when creating an account with us and when you request marketing communications to be sent to you.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see below our **Cookie Policy** for further information.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources. For example, analytics providers such as Google.

Information we collect from you

We may collect and process the following data about you:

- **Account Data:** is the information provided to create an account and log-in details for our Services.
- **Booking Data:** means the data about the booking you make as a Guest with a Client through our Site and/or Services.
- **Contact Data:** is the information you provide us with when forms on our Site are completed including name, last name, name, email address and mobile number.
- **Financial Data:** includes bank account and payment card details. If you are an existing Guest, we will ask you if you would like us to store your payment card information to speed up the transaction process.
- **Preference Data:** is the data you provide about the location, accommodation type and time period preferences for accommodation.
- **Marketing Data.** If you consent to receiving updates about our accommodation services, new products and other changes we may use your name and email address to send you such updates by email.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Sites.
- **Transaction Data:** includes details about payments to and from you and other details of bookings you make via the Site and/or with our Clients.

- **Usage Data:** means information about how your use of the Site and Services.

How do we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (i.e. when you purchase something from us).
- Where we have your prior consent to use your personal data (for example, where you have consented to receiving marketing).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#).
- Where we need to comply with a legal or regulatory obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/activity	Type of data	Lawful basis for processing
To respond to your enquiries	Contact Data	Consent (as you are requesting us to respond to you) Legitimate interests
To provide details of suitable properties where you request this	Contact Data Preference Data	Consent (as you are requesting us to respond to you) Legitimate interests

To enable Registered Users to access the Services	Account Data	Performance of a contract with you
Storing payment cards	Financial Data	Consent
To send you marketing emails	Marketing Data	Consent
To personalise our Site and improve user experience for the Site and Services	Technical Data Usage Data	Legitimate interests (to improve customer interactions)
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Contact Data Account Data Technical Data	Necessary for our legitimate interests (for running our business, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Performance of a contract with you
To manage bookings for Clients and Guests	Contact Data Transaction Data	Necessary for our legitimate interests (for operation of managed booking system) Consent
Website cookies to track user activity on cityroomrentals.co.uk (Please see our cookie policy for specific use)	Technical Data	Necessary for our legitimate interests (for operation of managed booking system) Consent

Disclosure of your information

We may have to share your personal information with the following third parties:

- External third-party service providers acting as processors who provide the following services:
 - Web hosting;

- Metrics and analytics; and
- Payment transaction processors.
- Clients whose properties we manage or market and with whom the Guest has booked or made an enquiry or request to book for a reservation.
- Please note this includes the international service providers listed below in International transfers.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors, controllers or joint controllers who require reporting of processing activities in certain circumstances. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If City Room Rentals or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

If we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The country has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- If we use certain service providers based outwith the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- If we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

- In any other case, we will obtain your explicit consent before any transfer takes place.

Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. The table below sets out details of transfers to such third parties and the relevant safeguards.

Service provider	Description of service	Safeguards
Stripe	Payment processing	Stripe has certified to the EU-US and Swiss-US Privacy shield.
PayPal	Payment processing	Paypal has certified to the EU-US and Swiss-US Privacy shield.
Hubspot	CRM data management	Data processing agreement that incorporates the model clauses of EU/EEA Customers. Also Privacy Shield Certified.
Capsule	CRM data management	Data processing agreement that incorporates the model clauses of EU/EEA Customers.
MailChimp	Email marketing and management	Mailchimp has certified to the EU-US and Swiss-US Privacy shield.

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

We have put in place appropriate security measures in accordance with industry best practice 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.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology and using trusted third parties. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you

are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, no method of transmission of information via the internet is completely secure. However, we follow all PCI-DSS requirements and implement additional generally accepted industry standards so that we can do our best to protect your personal data.

How long we store your personal data for

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.

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 requirements.

We normally delete personal identifiable information we hold on you within 2 years but in some circumstances you can ask us to delete your data sooner: see Deleting personal data below for further information.

Where we anonymise your personal data (i.e. so that it can no longer be associated with you) for further research or statistical purposes, then we may use this information indefinitely without further notice to you.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

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- [Access to your information](#)
 - [Request correction of your personal data](#)
 - [Request deletion of your personal data](#)
 - [Object to processing of your personal data](#)
 - [Request restriction of processing your personal data](#)
 - [Request transfer of your personal data](#)
 - [Right to withdraw consent](#)
 - [Right to review by an independent authority](#)
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If you wish to exercise any of the rights set out above, please [Contact us](#). 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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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 and keep you updated.

Access to your information

You have the right to ask for a copy of the information which we hold on you (commonly known as a 'data subject access request').

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Correcting personal data

You have the right to request that we correct personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected, though we may need to verify the accuracy of the new data that you provide to us.

Deleting personal data

You may ask us to delete or remove personal data where there is no good reason for us continuing to process it. This is more commonly known as the 'right to be forgotten'. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Please note, however, that we may not always be able to comply with your request to delete or remove personal data for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Objecting to processing

You have the right to stop us processing your personal data for direct marketing purposes. We will always inform you if we intend to use your personal data for such purposes, or if we intend to disclose your information to any third party for such purposes. You can usually exercise your right to prevent such marketing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [Contact us](#).

You may also object to us processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Restriction of processing

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Transferring your personal data

In certain circumstances, you may request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdrawing consent

Where we are relying on consent to process your personal data you can withdraw your consent at any time. Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Review by an independent authority

You will always have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office. If you do have a complaint, we would appreciate the chance to deal with your concerns before you approach the ICO, so please do [Contact us](#) in the first instance if possible.

Changes to our privacy policy

This version was last updated on 19.05.18

Historic version of this policy are archived here can be obtained by [Contacting us](#).

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.

Contact us

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Privacy Compliance team at bookings@cityroomrentals.co.uk .