

# HOSPIRIA PRIVACY POLICY

## 1. INTRODUCTION

### PURPOSE OF THIS PRIVACY POLICY

This privacy policy (“Privacy Policy”) aims to give you information on when, how and why Hospiria Ltd (“Hospiria”, “us” or “we”) collects and processes your personal data through your use of the Hospiria platform or any of Hospiria’s services including any data you may provide through when you make an enquiry, request a demo, contact us, pay for or use one of our service packages. Except where this Privacy Policy expressly states otherwise, Hospiria Ltd. is the controller of your personal data and the processor of your client’s personal data. We are a private limited company incorporated in England and Wales (no. 13639351) with our registered address at The Lightbulb 1.15 1 Filament Walk, London, England, SW18 4GQ. Hospiria comprises of the Hospiria platform and the Hospiria services (“the Hospiria platform”, “our platform” or “the platform”).

The Hospiria platform is not intended for children, and we do not knowingly collect data relating to children.

Our platform 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 platform, we encourage you to read the privacy policy of every website you visit.

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.

For the purposes of this Privacy Policy, “personal data” or “personal information” refers to personal data as defined by the Data Protection Laws (defined below), and includes

any data that personally identifies you (such as your name, address, email address or device information) and which is processed (i.e. stored, used, etc.) by us, as described more particularly in the section entitled “*What Personal Information Do We Collect?*” below. We process personal data only in compliance with applicable data protection laws, including the UK Data Protection Act 2018 and the EU General Data Protection Regulation (2016/679) and any legislation that replaces or supersedes them (together, the “Data Protection Laws”).

## 2. WHAT PERSONAL INFORMATION DO WE COLLECT?

We will need to ask you for certain personal information to give you the best possible experience when you receive our services or otherwise engage with us (via the Hospiria platform, email or otherwise).

We will also collect other information about you and the devices you use to access the Hospiria platform, or we may ask third parties to do this for us via technologies such as cookies. These are used to distinguish you from other users of our platform and enhance your experience of using the platform. For detailed information on the cookies we use and the purposes for which we use them see our **Cookie Policy**.

The personal data we collect from you might include your:

- Name;
- Email address;
- Postal address, including postcode;
- Telephone number;
- Mobile number;
- Date of birth;
- Payment information;
- IP address and other device information;

- Your activity on the Hospiria platform, including information about how you use the platform, products and services;
- Operating system information, the browser type, and the address of a referring website;
- Information you provide us relating to your properties, or otherwise;
- Your username and password, bookings made or received by you, your feedback and survey responses; and
- Your preferences in receiving marketing from us and our third parties and your communications preferences.

Except as described in this Privacy Policy, we do not generally ask you to disclose any special category data (e.g., medical information, details of race, religious or political beliefs, data concerning sexual orientation or sex life or membership of a trade union, or genetic or biometric data) to us. If we do ask you to provide us with any special category data, we will normally ask for your explicit consent in order to process this information.

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

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 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.

## **3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

### **INFORMATION THAT YOU PROVIDE TO US**

We collect personal information from you when you::

- send us an enquiry about the Hospiria platform;
- request a demo;

- ask for support on the Hospiria platform;
- register as a property manager;
- pay for a service package;
- accept a reservation via the Hospiria platform;
- give us feedback; or
- otherwise communicate with us or provide information to us, for example when making an enquiry about a particular service that we offer.

## INFORMATION COLLECTED BY AUTOMATED MEANS

We also obtain some of your personal information by automated means when you visit our platform, such as the IP address of the device you use, the geographical location of your device, the browser you are using, the URL you came from, the web pages you access, and your usage of the platform.

We collect this personal data by using cookies and other similar technologies. Please see our **cookie policy** for further details.

## INFORMATION WE RECEIVE FROM THIRD PARTIES

We may receive the following personal data about you from various third parties as set out below

- Certain basic information for payment purposes (such as from our payment processors Stripe Ltd), when you sign up to a service package;
- Details about payments to and from you from our platform partners when you take a booking for a property that is connected to the Hospiria platform such as booking.com; or
- Your 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 our platform from analytics such as Google based outside the UK.

## **4. HOW WE USE YOUR PERSONAL INFORMATION**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal information for the following purposes and legal bases:

### **PERFORMANCE OF A CONTRACT**

- To take the necessary steps to sign you up to the Hospiria platform and provide you with our services.
- To communicate with and manage our relationship with you regarding the services you receive or request from us.
- To deal with any enquiries or requests you make of us.
- To enable you to access our platform and use our services.
- To fulfil your requests and to process your transactions.

### **OUR LEGITIMATE INTERESTS**

- To send you important service updates regarding the platform and our services and our terms of service (including this Privacy Policy).
- To confirm your identity and authenticate the information you provide for security purposes.
- For our own reporting and analytical purposes to enable us to improve our services and support our users, including through the use of email performance and click-through tracking.
- For our own record-keeping and general administrative purposes regarding our handling of your personal data and other operational activities.
- To provide you with customer support and resolve any complaints.

- To effectively handle any legal claims or regulatory enforcement actions taken against Hospiria Ltd, or take appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to us.
- To assist with our internal training purposes.

## **COMPLYING WITH OUR LEGAL OBLIGATIONS**

- To comply with our legal and regulatory obligations (including under applicable Data Protection Laws).
- For preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies.
- To fulfil our duties to our members, colleagues and other stakeholders.

## **CONSENT**

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## **PROMOTIONAL OFFERS FROM US**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a booking made or other transactions.

## **CHANGE OF PURPOSE**

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 us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?**

We may disclose your personal information to the following recipients or categories of recipients

- Third party organisations who market your properties on their platforms, to the extent that such third party organisations require personal data for the purpose of performing their obligations under contracts with you;

- Third party organisations who provide insurance as part of our platform's packages, to the extent that such third party organisations require personal data for the purpose of performing their obligations under contracts with you;
- Our service providers and suppliers, who process such information for us or on our behalf (such as website or database hosting companies, address list hosting companies, email service providers, analytics companies, search engine providers, distribution companies, fulfilment companies, and other similar entities that help us to operate the website and/or provide functionality, content and services. Our service providers include (but are not limited to):
  - Google Analytics
  - HotJar
  - Leadfeeder
  - LeadForensics
  - Facebook
  - Sojern
  - Secura
  - Mailchimp
  - Google Maps
  - Stripe
  - Zoho
  - Hubspot (not yet but maybe in future)
  - Google Adwords



- As required by law, or to provide information as required by local law enforcement agencies, other local government authorities, or otherwise as required by law;
- Any third parties with whom we are required to share your personal data in order to comply with our legal obligations, to enforce our terms and conditions or to protect the rights, property, or safety of Hospiria, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

## **6. INTERNATIONAL TRANSFERS**

Some of our third-party processors, such as Google and HubSpot, are based outside the UK so their processing of your personal data will involve a transfer outside the UK.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data..
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **7. 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. 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.

## **8. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

Your personal information is stored by us and/or our service providers and suppliers, only to the extent and for the time necessary to achieve the purposes for which the information is collected, in accordance with the Data Protection Laws. When we no longer need to use your information for these purposes, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

## **9. YOUR CHOICES AND PRIVACY RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise one or more of these rights, please contact us with your request at [hello@hospiria.com](mailto:hello@hospiria.com).

### **YOUR RIGHT TO ACCESS THE INFORMATION WE HOLD ABOUT YOU**

You may request access to the personal data we hold about you. Our file of your information will usually be made available to you within one month, although occasionally we may not be able to give you access to all the personal data we hold about you. For example, we may not be able to give you access if the information we hold includes both your personal data and the personal data of others and disclosing

their information to you would adversely affect their rights. 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.

Please note that if you request a copy of your personal information using electronic means (such as email), then we will provide a copy of your personal information in electronic form unless you ask us to do otherwise.

We reserve the right to:

- refuse your request based on the exemptions set out in the applicable Data Protection Laws;
- request for proof of your ID to process the request or request further information; and
- charge you a reasonable administrative fee for any repetitive, manifestly unfounded or excessive requests.

If we refuse your request to exercise these rights, we will give reasons for our refusal and allow you to challenge our decision. If we have shared your personal data with others, we will tell them about your request to rectify, erase, restrict or object to the processing where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your personal data so that you can contact them directly.

## **YOUR RIGHT TO HAVE YOUR INFORMATION CORRECTED**

You have the right to have incomplete or inaccurate personal information that we process about you rectified. Note that you can always make certain adjustments to certain personal information directly through your online account.

## **YOUR RIGHT TO HAVE YOUR INFORMATION DELETED**

You have the right to request that we delete personal information that we process about you. This right applies only in certain circumstances. For example, we are not obligated to delete your data where we need to retain it in order to comply with our legal obligations or to establish, exercise or defend legal claims. Note that you can always

make certain adjustments to certain personal information directly through your online account.

## **YOUR RIGHT TO OBJECT TO US PROCESSING YOUR PERSONAL DATA**

Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

## **YOUR RIGHT TO WITHDRAW CONSENT TO PROCESSING**

If you have consented to us processing your personal data for a particular purpose, you have the right to withdraw your consent at any time, free of charge, by contacting us. This includes cases where you wish to opt out from marketing messages that you receive from us (including marketing messages that we send on behalf of third-party organisations). You can unsubscribe from marketing communications at any time by following the instructions in any individual message. If you withdraw your consent to processing, we may still contact you in connection with your account, relationship, activities, transactions and communications with us.

## **YOUR RIGHT TO HAVE AN ELECTRONIC COPY OF YOUR PERSONAL DATA TRANSMITTED (RIGHT TO DATA PORTABILITY)**

Where we hold personal data about you with your consent or for the performance of a contract with you, you also have the right to ask us to provide you with the personal data we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that personal data to another organisation.

## **YOUR RIGHT TO RESTRICT PROCESSING OF YOUR PERSONAL DATA**

You have the right to restrict our processing of your personal information where you believe such personal data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to

delete the data due to a legal or other obligation or because you do not wish for us to delete it.

## **YOUR RIGHT TO LODGE A COMPLAINT WITH THE LOCAL DATA PROTECTION AUTHORITY**

If you have any concerns about how we handle your personal information, please contact us. We will take any privacy complaint seriously and any complaint will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may reasonably request.

If you are not satisfied after we've tried to resolve your issue, you'll be entitled to lodge a complaint with our data protection regulator, the Information Commissioner's Office.

The Information Commissioner's Office can be contacted as follows:

**Telephone:** +44 0303 123 1113

**E-mail:** [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Website:** [www.ico.org.uk](http://www.ico.org.uk)

**Web-form:** [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/)

**Address:** Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

## **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review.

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 DETAILS**

If you have any questions about this Privacy Policy or our privacy practices, please contact our Data Protection Officer in the following ways:

**Full name of legal entity:** Hospiria Ltd (part of the Under The Doormat Ltd group)

**Email address:** hello@hospiria.com

**Postal address:** Hospiria Ltd, 1.15 The Lightbulb 1 Filament Walk, London SW18 4GQ