



KATHISMA BAY
VILLAS

PRIVACY NOTICE

Welcome to the Kathisma Bay Villas' privacy notice.

Data privacy is of high importance for Kathisma Bay Villas and we want to be open and transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Kathisma Bay Villas collects and processes your personal data, including any data you may provide through this website or via any other means (such as over the telephone) when you book your accommodation, when you sign up to our newsletter, when you take part in a competition etc.

This website is not intended for children and the only circumstances in which we collect data relating to children, is where you make a booking of travel services and you have children in your party.

It is important that you read this privacy notice 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 notice supplements the other notices and is not intended to override them.

Controller

Kathisma Bay Villas is the controller and responsible for your personal data (collectively referred to as Kathisma Bay Villas, "we", "us" or "our" in this privacy notice.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 24/05/2018 and historic versions 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 any of the details you provide to us should change, during the course of your relationship with us.

Third-party links

This 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 notice of every website you visit.

2. What type of information do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may receive, collect and store any information you enter on our website or provide us in any other way.

(A) Identity Data

This includes data relating specifically to your identity, such as your first name, maiden name, last name, marital status, title, date of birth, gender

(B) Contact Data

This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone numbers.

(C) Financial Data

This includes data relating to your means and methods of payment, such as your bank account and payment card details.

(D) Other Data

This includes data relating to communications, comments, feedback, reviews, recommendations.

(E) Technical Data

This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address *used to connect your computer to the Internet*, 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 this website.

(F) Usage Data

This includes information about how you use our website, products and services. This may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

(G) Marketing and Communications Data

This includes your preferences in relation to whether or not you want to receive marketing from us and our third parties and also your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice.

We collect and process the above data only where it is strictly necessary to do so in order to deliver the travel service that you have purchased. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we won't be able to make the necessary arrangements to provide the travel services that you have booked or are attempting to book. As a result, if you do not provide your consent, we will be unable to proceed with your booking.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time. However, as this will prevent us from providing the travel service you have booked, we will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellations in clause [TBA] of our Booking Terms and Conditions will become payable.

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.

In other words, where we require details from you in order to provide you with your chosen travel services, if you do not provide us with the necessary details then we will not be able to provide the services you have booked or are attempting to book.

In this case, depending upon when you fail to provide the necessary data, we may either not be able to process your booking or we may have to cancel your booking, in which case we will treat this as a 'cancellation by you' in accordance with our [Booking Terms & Conditions](#). We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

3. How do we collect information?

When you conduct a transaction on our website, as part of the process, we collect personal information you give us such as your name, address and email address. We use different methods to collect data from and about you including through:

(A) Direct interactions

You may give us your Identity, Contact, Technical, Usage and Marketing Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes personal data you provide when you:

- make a booking to stay at Kathisma Bay Villas;
- subscribe to our newsletter or other publications;
- make an enquiry via the contact form;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback;

(B) 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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) below for further details.

(C) Third parties

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

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Facebook based outside the EU; and
- Twitter based outside the EU
- Instagram based outside the EU
- LinkedIn based outside the EU

Search information providers such as:

- Google based outside the EU
- Bing based outside the EU
- Yahoo based outside the EU

4. How do we store, use, share and disclose our site visitors' personal information?

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

What will we do with it?

- (1) We will use your name and address towards completing your booking with us.
- (2) We will also use your details to manage your arrangements, send you notifications and communicate with you generally
- (3) We may need to disclose your information where required by law, where such a request is made by a legal authority.

(4) We may from time to time contact you with information about special offers, brochures, new products, forthcoming events or competitions. If you do not wish to receive such information, you may ask us in writing not to receive it.

We would also like to store and use your personal details for future marketing purposes (for example, emailing you our newsletter). All details you give us in connection with your booking will be kept but we will use only names and contact details for marketing purposes unless you have indicated that you do not wish us to do so.

We have taken all reasonable steps to have appropriate security measures in place to protect your information. Outside the European Economic Area, controls on data protection may not be as wide as the legal requirements in this country. The transmission of information via the internet is never completely secure. We exclude our liability for personal data lost in transmission to the website.

5. Why do we collect such personal information?

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.

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 including basis of legitimate interest
To register you as a new customer.	a) Identity; (b) Contact. (C) Marketing and Communications.	Performance of a contract with you.
To process and deliver your booking including:	(a) Identity; (b) Contact;	(a) Performance of a contract with you;

<p>(a) Manage payments, fees and charges;</p> <p>(b) Collect and recover money owed to us.</p>	<p>(c) Financial;</p> <p>(d) Transaction;</p> <p>(e) Marketing and Communications.</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us).</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy;</p> <p>(b) Asking you to leave a review or take a survey.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Profile;</p> <p>(d) Marketing and Communications.</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</p>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Profile;</p> <p>(d) Usage;</p> <p>(e) Marketing and Communications.</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Technical.</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To deliver relevant website content and advertisements to you and measure or</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to</p>

understand the effectiveness of the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

6. How do we communicate with our site visitors?

We may contact you to notify you regarding your booking, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, to send updates about our company, or as otherwise necessary to contact you to enforce our User Agreement, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email, telephone, text messages, and postal mail.

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 Identity, Contact, Technical, Usage and Profile 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 or purchased services from us and, in each case, you have not opted out of receiving that marketing.

Newsletters

Users may subscribe to our newsletter service. We and HomeAway group may offer different newsletters from time to time intended to enhance the services we or they offer. All Users may cancel their subscription to these email newsletters at any time through [contacting us](#) although it may take a short while for the changes in your preferences to become effective.

Surveys

We may use surveys to gather information about our users. From time to time, we request users' input in order to evaluate potential features and services. The decision to answer a survey is completely yours. We use information gathered from surveys to improve our services.

Third party

We will get your express opt-in consent before we share your personal data with any company outside The Villa Collective group of companies for marketing purposes.

7. Cookies Policy

Please note that in order for us to provide you with optimum service, we use 'Cookies' on our website.

What are cookies?

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. Two types of cookies are used on this web site - session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site, and persistent cookies, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Cookies allow us to obtain information regarding users of our site which essentially helps us to provide you with a better user experience and tailor our services to your individual needs. We may collect information such as your IP address, online activity, web browser details and online activity. We will not however collect or store any of your passwords or other highly sensitive data.

By using our website with your browser settings adjusted to accept all cookies, we will take this to mean that you want to use our products and services, and that you consent to our use of cookies and other technologies as described in this Policy.

Browser settings: Most browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. You may elect to reject cookies by adjusting your browser's settings but doing so will limit the range of features available to the visitor on our site and most other major websites that use cookies.

We use the following types of cookies on our website:

Category 1: Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

Category 2: Performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

By using our website, you agree that we can place these types of cookies on your device.

Further information

To find out more information about cookies, please visit www.allaboutcookies.org.

How do we use cookies and other tracking tools?

It's important to note that third-party services, such as Google Analytics or other applications offered through the Wix App Market, placing cookies or utilizing other tracking technologies through Wix's services, may have their own policies regarding how they collect and store information. As these are external services, such practices are not covered by the Kathisma Bay Villas Privacy Policy.

8. How long we retain your 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.

In addition to the above, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: you can [contact us](#) and Request erasure.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. 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.

10. Privacy policy updates and Changes

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

11. Opt-Out Policy

If you don't want us to process your data anymore, please contact us by email at info@kathismabayvillas.com

12. Questions and our contact information

If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to contact us at info@kathismabayvillas.com