



PRIVACY POLICY

The Luxury Villa Collection is committed to keeping your data safe and secure and handling it appropriately within the guidelines of the global data protection regulations. This privacy policy is to tell you what personal data we collect from you when you visit our website (regardless of where you visit it from) or when you otherwise provide personal data to us via other means (such as over the telephone), why we collect it, and what we will do with this data.

When you request a quotation or book a villa, we collect your name, email address, mailing address and phone number. We also monitor customer traffic patterns and website use which enables us to improve our service.

The Luxury Villa Collection respects your privacy and is committed to protecting your personal data. Please also use refer to the Glossary that we have set out at the end of the Policy, if there is any terminology used in this privacy notice that you are unfamiliar with or that you don't fully understand.

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.

I. IMPORTANT INFORMATION AND WHO WE ARE

The Luxury Villa Collection is a trading name of Speciality Stays Ltd (collectively referred to as "Speciality Stays", "The Luxury Villa Collection", "we", "us" or "our" in this privacy notice). For the purposes of EU General Data Protection Regulation (which is otherwise known as GDPR) and a new UK Data Protection Act 2018, Speciality Stays LTD is a data controller in respect of the personal data you provide us with, in certain circumstances a data processor and responsible for your personal data

We will only process your personal data as set out in our privacy policy or otherwise notified to or agreed by you or as we are otherwise permitted to do in accordance with data protection laws

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Company 07937358



CONTACT DETAILS

Our full details are:

Full name of legal entity: Speciality Stays LTD
Name: Data Protection Compliance Manager
Email address: data@specialitystays.com
Postal address: 8th Floor, Becket House, 36 Old Jewry, London EC2R 8DD

You have the right to make a complaint at any time. There are many data protection supervisory bodies around the world however, we would suggest that you make any complaints to the United Kingdom data protection supervisory body (“the Information Commissioner's Office”) (ICO), (ico.org.uk). This would allow us to handle your complaint more effectively and quickly. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

If we change our Privacy Policy and/or any procedures that involve the information that you have provided to us, we will post those changes on our websites. This will ensure you are aware of current information collection methods, uses for that data as well as under what circumstances we may disclose it. Your continued use of our services (including our websites and apps) after this Privacy Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of this Policy, as amended. We encourage you to bookmark this page and review this Privacy Policy at regular intervals.

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.

USERS OF OUR SERVICES

Our online bookings service and the online functions of our websites are only intended for users aged 13 years and over, so please do not use them if you are under 13 years old. As part of the booking process, we will ask for the age and/or date of birth of any

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persons under 18 years of age within the party. This information is collected so that we can ensure that your reservation complies with the supplier's Terms and Conditions. This information is not used for any other purpose.

By using our websites (which includes our mobile site and any apps) and by providing us with your information, you acknowledge that we may collect and use your information in accordance with this Privacy Policy. Where you submit information to us through our websites, or when you contact us, you confirm that, where you are providing details on behalf of someone else you have permission to do so and that you have read, and agree to, the terms of our Privacy Policy.

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. THE DATA WE COLLECT ABOUT YOU

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 collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A) Identity Data: This includes data relating specifically to your identity, such as your first and last name and age.
- B) Contact Data: This includes data relating to how you may be contacted, such as your 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) Transaction Data: This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.

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, 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.

G) Special Categories of Personal Data: During our interactions we may collect special categories of personal data about you as detailed below. This may be inadvertently revealed as the result of a group you travel with, or it may also be because you want us to know certain personal data in order that we can provide you with the best possible service and advise you whether a trip is suitable for you. Health is one of the best examples of this.

E.g. If we receive a group booking from a specific religious association, we will inadvertently have details of religious beliefs of those individuals. The same can be said for special dietary requests on religious grounds, or bookings from groups with political or ethnic associations.

E.g. We are sometimes asked whether certain facilities can be arranged in a villa which discloses certain medical conditions.

We collect and process the above data only where it is strictly necessary to do so. 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.

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.

H) 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.

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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.

3. HOW YOUR PERSONAL DATA IS COLLECTED

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

A) 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, email or otherwise. This includes personal data you provide when you:

- navigate the website, search for, price up, or make an enquiry about villa or other related accommodation or concierge services;
- complete a villa accommodation booking form;
- subscribe to our newsletter or other publications;
- interact with one of our Social Media pages (e.g. Twitter or Facebook);
- request information about local activities and villa services to be sent to you;
- contact us via text message to make arrangements for your arrival into a villa or view a villa before making a reservation;
- enter a competition, promotion or survey;
- give us some feedback about your stay;
- provide financial details for the refund of your breakages deposit;
- send us a message via SMS, iMessage or Whatsapp in relation to your booking or potential booking.

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 (see further information below),.

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;
- usage data to improve and customise your online experience with us stored within our website database based both within EU.
- advertising networks and personalisation software such as Google Ad Words, Facebook and Bing based inside and outside the EU;

D. Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe and Paypal based both inside and outside EU.

4. HOW 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:

- To provide a high quality and relevant service to you
- To improve our services for you and to tailor our products and services to your requirements
- Where we need to set up or are in the process of setting up a contract between you and the property owner (supplier).
- Where we need to respond to a request for information from you, such as pricing and availability of villas, or supplementary services from our concierge partners.
- 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.
- Where we need to comply with a legal or regulatory obligation
- To provide the Supplier of your accommodation or concierge services with the required information to process and fulfil your booking and to send you service related emails and text messages for your booking.
- We will also use these details to send you a follow-up email after your holiday, to check that you were satisfied with your holiday



Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending 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.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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 at 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 and respond to your enquiry	(A) Identity (B) Contact	Necessary for our legitimate interest
Creation of itinerary and trip planning, which includes the transfer of data to the supplier of our Concierge services	(A) Identity (B) Contact (G) Special Categories of Personal Data	(a) Performance of a contract with you (b) Necessary for our legitimate interest
To process and deliver your booking including: Confirm booking information; Service your booking; Manage payments, fees and charges; Collect and recover money owed to us;	(A) Identity; (B) Contact; (C) Financial; (D) Transaction; (H) Marketing and Communications. (G) Special Categories of Personal Data	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to recover debts due to us, to service your booking).
To manage our relationship with you which will include: Right to rectification of your personal information. Asking you to leave a review or take a survey.	(A) Identity; (B) Contact; (H) Marketing and Communications;	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to keep our records updated and to study how

<p>To enable you to partake in a prize draw, competition or benefit from a special booking offer.</p>	<p>(A) Identity; (B) Contact; (F) Usage; (H) Marketing and Communications.</p>	<p>customers use our products/services).</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; (B) Contact; (E) 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>(c) To enhance and customise the user experience</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(A) Identity (B) Contact (F) Usage (H) Marketing and Communications (E) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy); to enhance customer experience</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(E) Technical (F) Usage</p>	<p>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)</p>
<p>To make suggestions and recommendations to you based</p>	<p>(A) Identity (B) Contact</p>	<p>Necessary for our legitimate interests (to develop our</p>



on your initial request for information	(E) Technical (F) Usage	products/services and grow our business)
To provide Arrival Forms to the Spanish Authorities as required under the Tourist Accommodation Regulations	(A) Identity (B) Contact	Necessary to comply with a legal obligation

DATA RETENTION PERIOD

For all the purposes for which we will use your personal data outlined in the table above, we will retain your personal data until you request for it to be deleted or after 36 months of inactivity with The Luxury Villa Collection. For customers who book with us, we will retain your data for accounting purposes for a period of 7 years.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

MARKETING

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

We have established the following personal data control mechanisms:

- When signed up to our newsletter, you have the opportunity to unsubscribe using the link at the bottom of email newsletters sent to you, or by contacting us directly.
- To enhance our booking service, we send information, tips and advice on the run up to your holiday to make sure you know everything there is to know. You have the opportunity to unsubscribe using the link at the bottom of every email sent to you, or by contacting us directly.
- Promotional offers from us
- We may use your 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,

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services and offers may be relevant for you to enhance your customer experience.

- 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 opted in to receive that marketing.

THIRD-PARTY MARKETING

It is not our usual policy to share your personal information with any company outside Speciality Stays LTD for marketing purposes, but if we did we would only do so with your express opt-in consent.

OPTING OUT

You can ask us to stop sending you marketing messages at any time by following the opt-out unsubscribe links on any marketing message sent to you or by contacting your travel consultant at any time or by send an email to data@specialitystays.com.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of a purchase of arrangements or other such transactions.

COOKIES

As is the common practice, our website uses standard cookies. A 'cookie' is a small data file which our website server stores on your computer in order to collect information about your visit and to remember you when you visit again at a later date.

The main purpose of a cookie is enhance and personalise your visit by customising web pages for your use. We may also use third parties who will collect data which is not personally identifiable to analyse site visits and carry out other similar activities. In the course of doing so, they may place their own cookies on your computer so that they can collect information about your visit.

You may if you wish disable or delete such cookies through your internet browser. However, doing so may mean you will be unable to access our website or parts of it, your experience of our website may be adversely affected, and/or you may not receive information which is relevant to your personal interests.



If you've used our website we may use advertising on other websites and on social media sites and apps, to remind you about the services we provide based on your browsing.

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 . 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. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- (B) External Third Parties as set out in the Glossary.
- (C) 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 notice.

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. TRANSFERRING YOUR DATA OVERSEAS

We share your personal data within the Company. This will involve transferring your data within the European Economic Area (EEA).



Our external third parties are primarily based within the European Economic Area (EEA) so their processing of your personal data will not involve a transfer of data outside the EEA.

Where you have made a booking of travel services which are located or otherwise due to be fulfilled outside the EEA, we are required and are permitted to transfer your personal data to the supplier of the services that you have purchased, outside the EEA in order to make your booking and for those suppliers to be able to provide you with the travel arrangements you have booked.

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. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure 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.

If you wish to exercise any of the rights set out above, please contact us at data@specialitystays.com



NO FEE USUALLY REQUIRED

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.

WHAT WE MAY NEED FROM YOU

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.

Time limit to respond

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.

9. GLOSSARY

LAWFUL BASIS

Legitimate Interest

means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. 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

Performance of Contract

means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.



Comply with a legal or regulatory obligation

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

Suppliers of accommodation and travel services acting as processors based in the EU, who provide the elements of any booking that you initiate with us. (Ie. Villa Owners and Concierge partners)

Service providers acting as processors based inside and outside of the EU who provide the technology to pass and store your information, to send relevant communications to you (Ie. Zapier, Mailchimp, Dropbox, iPro, FreeAgent)

Service providers acting as processors based inside and outside of the EU who provide technical support and development for our website.

Feedback Partners used to deliver your post-holiday invitation to review and publish feedback about your holiday with us

Marketing Database Partners used to facilitate communications such as new availability and travel information, as well as managing email suppression lists.

Legal bodies such as the Spanish Police authorities: Where we are obliged to, or permitted to do so, by law, court order, search warrant or similar presented by any law enforcement or government officer.

3rd Party Payments

Payment Partners: your information is shared to process payments for your holiday. Our payment partner uses internet standard encryption technology, Secure Socket Layer (SSL) which encodes your credit and debit card details and booking confirmation information before it is sent.

When you make a payment by Paypal, Stripe or similar payment solution, by clicking on the proceed to payment button, you understand and agree that: (i) you will be leaving the Luxury Villa Collection website and will be transferring to their payment platform, (ii) any your information you enter shall be subject to their own privacy policy, (iii) your information may be processed and stored outside of the European Union and (iv) they shall be responsible for all processing of your information.

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Whatsapp Messenger

When you contact us via Whatsapp, by clicking on the send button, you understand and agree that any information you enter shall also be subject to their own privacy policy. We will not share your contact details with any 3rd parties on Whatsapp unless it is necessary for the performance of our contract with you (for example so the Property Manager can coordinate your arrival time at the villa with you) and never for marketing purposes.

YOUR LEGAL RIGHTS

You have the right to:

Request access

to your personal data (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.

Request correction

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

Request erasure

of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing

of 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have



compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing

of your personal data. 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.

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. 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.

Withdraw consent at any time

where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.