



## **SPECIALTY STAY LTD PRIVACY POLICY**

### **INTRODUCTION**

Specialty Stays Ltd (trading as The Luxury Villa Collection), a company registered in England and Wales with company no. 07937358 and registered office address of 8<sup>th</sup> Floor Becket House, 36 Old Jewry, London EC2R 8DD (referred to as “we”, “us”, or “our” in this Privacy Policy), respects your privacy and is committed to keeping your personal data safe and secure, and handling it appropriately. This privacy policy will inform you as to how we look after your personal data 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) and to tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format so that you can easily click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here:

[https://theluxuryvillacollection.com/wp-content/uploads/2025/08/Luxury-Villa-Privacy-Policy\\_final-Travlaw-clean-12.2.pdf](https://theluxuryvillacollection.com/wp-content/uploads/2025/08/Luxury-Villa-Privacy-Policy_final-Travlaw-clean-12.2.pdf).

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.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy aims to give you information on how we collect and process your personal data, including any data you may provide through this website or via any other means (such as over the telephone) when you purchase travel services, 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 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.

### **DATA CONTROLLER**

Specialty Stays Ltd (trading as The Luxury Villa Collection) (collectively referred to as "we", "us" or "our" in this Privacy Policy) is the controller and responsible for your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### **CONTACT DETAILS:**

Full name of legal entity: Specialty Stays LTD

Name: Data Protection Compliance Manager

Email address: [data@specialtystays.com](mailto:data@specialtystays.com)

Postal address: 8th Floor, Becket House, 36 Old Jewry, London EC2R 8DD

You have the right to make a complaint at any time to the United Kingdom data protection supervisory body ("the Information Commissioner's Office") (ICO), ([ico.org.uk](https://ico.org.uk)) for data protection issues. 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 PRIVACY NOTICE & YOUR DUTY TO INFORM US OF CHANGES**

We keep our Privacy Policy under regular review. This version was last updated in February 2025 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**

[WWW.THELUXURYVILLACOLLECTION.COM](https://www.theluxuryvillacollection.com)

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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. **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 Policy.

## SPECIAL CATEGORIES OF PERSONAL DATA

We collect the following special categories of personal data about you. Details about your:

- Health;
- Dietary requirements which may disclose your religious or philosophical beliefs;



- Genetic or biometric data;
- Bookings from groups with political or ethnic associations may disclose political and/or race and/or ethnicity;

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. 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 cancellation charges referred to in clause [clause no.] of our Booking Terms and Conditions [insert link] 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 and Conditions [insert]. We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

### **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);

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- 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. Please see our cookie policy 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:
  - i. analytics providers such as Google based outside the UK;
  - ii. usage data to improve and customise your online experience with us stored within our website database based both within UK.
  - iii. advertising networks and personalisation software such as Google Ad Words, Facebook and Bing based inside and outside the UK;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe and PayPal based both inside and outside UK.

Please note that when using our website, you may be able to share information through social networks like Facebook and X. For example, when you 'like', 'share' or review our services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them. This will not be the responsibility of Specialty Stays Ltd.

## **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

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- 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

Click here [[LINK TO GLOSSARY, LAWFUL BASIS](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate</b>
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:	(A) Identity; (B) Contact;	
Confirm booking information;	(C) Financial;	(a) Performance of a contract with you;
Service your booking;	(D) Transaction;	(b) Necessary for our legitimate interests
Manage payments, fees and charges;	(H) Marketing and	(to recover debts due to us, to service
Collect and recover money owed to us;	Communications. (G) Special Categories of Personal Data	your booking).
To manage our relationship with you which will include:	(A) Identity;	(a) Necessary to comply with a legal obligation;
Right to rectification of your personal information.	(B) Contact;	(b) Necessary for our legitimate interests
Asking you to leave a review or take a survey.	(H) Marketing and Communications;	(to keep our records updated and to study how customers use our products/services).
To enable you to partake in a prize draw, competition or benefit from a special booking offer.	(A) Identity; (B) Contact; (F) Usage; (H) Marketing and Communications.	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(A) Identity; (B) Contact; (E) Technical.	(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); (b) Necessary to comply with a legal obligation. (c) To enhance and customise the user experience
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(A) Identity (B) Contact (F) Usage (H) Marketing and Communications (E) Technical	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

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(E) Technical (F) 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 based on your initial request for information	(A) Identity (B) Contact (E) Technical (F) Usage	Necessary for our legitimate interests (to develop our 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

## 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:

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

- **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 sending an email to [data@specialitystays.com](mailto: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. Please see our cookie policy for further detail.

## **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. 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.

- A. External Third Parties as set out in the Glossary.
- B. 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. These are further set out in the Glossary.

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 PERSONAL DATA OVERSEAS**



Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Where you have requested a booking for travel arrangements which are located or otherwise due to be fulfilled outside the UK, we will have to transfer your personal data to the suppliers fulfilling or providing those travel arrangements outside the UK in order to make your booking and for those suppliers to be able to provide you with the travel arrangements you have booked.

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.

Where we are unable to rely on one of the safeguards outlined above when transferring data to those suppliers outside the UK, we may rely on a derogation under Article 49 of the UK GDPR in order to transfer your personal data so that we can perform the contract we have with you. We will only do this where the transfer of personal data is necessary to perform our contract with you, and where it is proportionate for us to rely on the exemption. You acknowledge that where your personal data is transferred outside the UK, controls on data protection may not be as wide as the legal requirements within 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. DATA RETENTION PERIOD**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including as outlined in the table above, as well as for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirement. We may retain your personal data for a longer period in the event of a compliant or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.



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, regulatory, tax accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction for 7 years after they cease being customers for tax purposes.

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.

## **9. YOUR LEGAL RIGHTS**

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

- A. Request access to your personal data.
- B. Request correction of your personal data.
- C. Request erasure of your personal data.
- D. Object to processing of your personal data.
- E. Request restriction of processing your personal data.
- F. Request transfer of your personal data.
- G. Right to withdraw consent.

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



## 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.

## 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**
  - i. 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. (I.e. Villa Owners and Concierge partners)
  - ii. 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 (I.e. Zapier, Mailchimp, Dropbox, iPro, FreeAgent)
  - iii. Service providers acting as processors based inside and outside of the UK who provide technical support and development for our website.
  - iv. Feedback Partners used to deliver your post-holiday invitation to review and publish feedback about your holiday with us
  - v. Marketing Database Partners used to facilitate communications such as new availability and travel information, as well as managing email suppression lists.

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- vi. 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.
- vii. 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.

- viii. 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:

- i. if you want us to establish the data's accuracy;
- ii. where our use of the data is unlawful, but you do not want us to erase it;
- iii. 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
- iv. 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.