

# Privacy Notice

Dated: February 2024

**Key changes: We have made it clearer to understand what types of data we use for each purpose we process personal data for.**

## Guests – if you have made a booking, enquiry or visited our website

### *1. About this privacy notice and who we are*

This privacy notice provides information on how the Awaze group of companies, details of which can be found here <https://www.awaze.com/>, process your personal information when you make a booking or booking enquiry through us, visit our website, contact us or use our services, including our wifi. The controller is:

- Awaze Vacation Rentals Ltd if you make, or enquire about making, a booking for a holiday property in the UK, visit our UK based websites or use our UK based services. Awaze Vacation Rentals Ltd can be contacted about data protection issues by email to [datachanges@awaze.co.uk](mailto:datachanges@awaze.co.uk)
- Awaze A/S if you make, or enquire about making, a booking for a holiday property in Europe (excluding the UK), visit our European (excluding the UK) based websites or use our European (excluding the UK) based services. Awaze A/S can be contacted about data protection issues by email at [datainformation@awaze.com](mailto:datainformation@awaze.com)

We keep our privacy notice under review and we will place any updates on our webpage. We will contact you to let you know about any significant changes.

### *2. What personal information we process and why?*

We will only process personal information about you when we need to and this may include:

- **Personal details** such as your name, contact details (phone number, email address and home address), customer ID and your username and password
- **Payment details** such as payments made to and from you and partial payment card details or the IBAN number
- **Booking details** such as properties and services booked through us, booking references and travel dates
- **Identification details** such as passport details or identification number where this is required for your booking, for example if you have booked a property in a location where we are required to collect this information under local tourism laws
- **Contact history** such as emails, letters, live chats, call recordings and social media messages to and from you
- **Usage details** such as IP address, device type, how you use or interact with our website, emails, content or ads (e.g. pages visited, links clicked and properties viewed). Please see our Cookie Policy (a link can be found at the bottom of this page) for more information about this.

We don't typically collect special categories of personal information, but on occasion this may be required to provide our service to you, for example, where you provide us with health information,

including any difficulties with mobility, for us to ensure that your requirements can be met. This may also be necessary for insurance or legal purposes for example, if you have an accident at a property you have booked through us and medical data is required as part of the claim.

The provision of some personal information is a legal or contractual requirement and if you do not provide it, we may not be able to enter into or perform the contract with you and may therefore cancel your booking. We will tell you if this is the case and will not be liable to you.

We generally collect personal information directly from you, but we may also receive your data from third parties. For example:

- If you book via one of our booking partners
- Other guests in your party
- If you enter a competition relating to us via a third party
- Publicly available sources

If you provide information about other people when making a booking, this privacy notice will apply to all personal information you have provided about them and you should bring this privacy notice to their attention.

We may use your personal information for any of the purposes explained below, depending on how you interact with us.

<b>Purpose for processing</b>	<b>Personal data used</b>	<b>Lawful basis for processing</b>
To enable us to complete and manage your booking or related travel arrangements, including taking payment and giving refunds	Personal details, payment details, identification details	Contract Consent
To manage your online account with us	Personal details	Consent Legitimate interest in providing good customer service
Keep a record of any financial transactions with you	Payment details	Legal obligation
To invite you to leave a review about our services	Personal details, booking details	Legitimate interest in understanding the perception of our business and improving our services
To send service messages, including booking updates and changes to our terms and conditions	Personal details	Contract Legitimate interest in keeping our customers updated
Manage your participation in any promotions, offers or competitions you choose to participate in	Personal details	Consent

<p>To allow you to communicate with the owner of a property you have booked we may share your contact details. Alternatively, we may mask your contact details and direct communications via our communication channels. We may analyse these communications to investigate potential breaches of our terms, fraud or security issues and for product development. We reserve the right to review or block the delivery of communications that we believe might breach our terms, contain malicious content or spam, or pose a risk to you or others.</p>	<p>Contact history</p>	<p>Legitimate interest in allowing communication between guests and owners of properties, ensuring these communications are secure and comply with the law and our terms and improving our business</p>
<p>To provide details or information you may have requested</p>	<p>Personal details</p>	<p>Consent</p>
<p>Provide and improve our customer service and support, including quality control and training</p>	<p>Personal details, booking details, contact history</p>	<p>Legitimate interest in improving our service, staff training, record keeping and resolving issues</p>
<p>To personalise our services to you, for example, where allowed, we may identify you when you visit our website so that we can remember your preferences and previous actions e.g. properties you were looking at on our website.</p>	<p>Usage details</p>	<p>Consent Legitimate interests in providing the best browsing experience</p>
<p>Monitor our website, including its performance and security and, where allowed, analysing the behaviour of visitors to our website so that we can protect and improve our website.</p>	<p>Usage details</p>	<p>Consent Legitimate interest in maintaining the integrity and security of our website and providing the best browsing experience</p>
<p>To carry out marketing activities. As well as sending our newsletter, we also use booking and usage details to send personalised advertisements and display these on websites and social media to you or similar audiences. As part of this we provide hashed</p>	<p>Personal details, booking details, usage details</p>	<p>Consent Legitimate interests in working out which of our services you may be interested in and telling you about them</p>

information to third party advertising partners such as Facebook and Google. We may also use publicly available information to understand our customers better and improve our marketing.		
To provide your contact details to a third party to provide you emergency assistance in the event of a travel crisis or other unforeseen travel incident.	Personal details	Legitimate interest in protecting our business and customers
For analytics and product improvement. This includes testing, addressing security or technical issues, data analysis, statistics, improving our website and communications, and developing new products and services. We use anonymised data to do this where possible, but may need to use personal data on occasion e.g. if you are experiencing a technical issue with our website, we may need to use information about your device.	All data	Legitimate interests in evaluating our range of services and improving our business
For legal purposes. This includes handling legal claims, ensuring compliance with our booking conditions and other agreements, complying with government advice, regulatory requirements and legal obligations and detecting, preventing and reporting crime.	All data	Legal obligation  Legitimate interest in protecting our business and assisting law enforcement and government bodies

Where special categories of personal information are required for any of the above purposes, we use this where we have your explicit consent, where you have made the information public or in relation to legal claims.

### *3. Sharing your data within the Awaze group*

We are part of the Awaze group of companies (listed at [www.awaze.com](http://www.awaze.com)) and we sometimes use joint technology and may share your personal data with other companies in the Awaze group, their employees, contractors and service providers. This does not affect the purposes we use your personal data for and, includes:

- managing your booking,
- providing customer service,

- detecting, preventing and reporting crime,
- monitoring our website; and
- marketing activities where permitted.

We also share anonymised data for analytics and product improvement. We rely on our legitimate interests in providing a good service, improving our service and protecting our business to share within the Awaze group. Group companies either act as our processor or joint controller and we have an intra group data sharing agreement in place to ensure the data is secure and handled in line with applicable laws.

#### *4. Sharing your data outside the Awaze group*

To effectively provide our services and run our business, we may share your personal information with:

- owners or agents of the property you have booked including their service providers where necessary, such as cleaners and key keepers (this may include your phone number, email address and home address where necessary in relation to the booking. This may also include identification details where this is required for legal purposes such as under tourism tax laws)
- service providers, acting as processors, who provide IT, system administration, website hosting and support, marketing, customer support, cleaning and maintenance and customer review services
- professional advisors, including bankers, lawyers, auditors, accountants and insurers who provide us with services
- third party advertising partners
- our preferred insurance provider(s) (if you purchase any insurance policy we offer)
- credit/debit card companies
- payment service providers
- government agencies, regulators and other authorities
- third parties who we may need to work with to deliver services or fulfil travel plans on your behalf, for example resorts, holiday parks, management companies, owners' associations
- third party booking or distribution platforms, travel agents and booking partners
- third parties that we may choose to sell, transfer, or merge parts of our assets or business to or with and businesses we acquire or merge with
- third parties you have authorised us to speak to, including mediators

Third parties are required to process your personal information in line with data protection legislation. Where a third party is acting on our behalf, we do not allow them to use your information for their own purposes and we ensure they have appropriate security measures in place to protect your information.

#### *5. International transfers*

We are a global business and use suppliers located across the world. This means that sometimes we need to transfer your personal information outside of the UK and EU. We only do this where we are satisfied that there are adequate measures in place to protect your personal information in a way that is consistent with, and respects, UK and EU data protection legislation. We will ensure at least one of the following safeguards is implemented:

- an adequacy decision; or
- approved contractual measures and where necessary, supplementary measures.

If you would like further details of the applicable transfer mechanism, please contact us.

#### *6. How long we keep your information for*

We will only keep your information for as long as necessary based on the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, any legal or regulatory requirements and any relevant industry standards or guidelines. Where your information is no longer required, it is disposed of or deleted in a secure manner or anonymised so that it can no longer be associated with you.

#### *7. Your rights*

Under certain circumstances, you have the right to:

- **Request access** to a copy of the personal information we hold about you (commonly known as a "subject access request").
- **Request that we correct any inaccurate or incomplete** personal information that we hold about you. Remember, you can update your contact details through My Account.
- **Request that we delete** your personal information where there is no good reason for us continuing to process it (commonly known as the "right to be forgotten").
- **Object to us using your data** for direct marketing or, in some circumstances, using it for legitimate interests.
- **Request restriction** of the processing of your personal information. This allows you to ask us to limit the way we process your personal information, for example if you dispute the accuracy of the information we hold about you.
- **Request data portability**, whereby we transfer the personal information you have provided to us, either directly to you or a third party.
- **Withdraw your consent** where we rely on your consent to process your information.

There is no fee to exercise your rights, unless your request is unfounded or excessive, in which case we may charge you a reasonable fee or refuse to comply with the request. We may need to request information from you to help us confirm your identity and identify the information you are referring to.

If you wish to exercise any of these rights, please contact us. We aim to respond to requests within one month, but where permitted we may extend this by two months and will notify you of this.

You also have the right to raise concerns about our use of your personal information with the relevant supervisory authority, such as the Information Commissioner in the UK (<https://ico.org.uk>) or Datatilsynet in Denmark (<https://www.datatilsynet.dk/>), at any time, but we encourage you to contact us in the first instance so that we may discuss your concerns.

Owners – if you let, enquire about letting, or have been contacted by us about letting your holiday property through us, visited our website or used our app

*1. About this privacy notice and who we are*

This privacy notice provides information on how the Awaze group of companies, details of which can be found here <https://www.awaze.com/>, process your personal information if you let, enquire about letting, or have been contacted by us about letting a holiday property, visit our website, or use our app.

The controller is:

- Awaze Vacation Rentals Ltd if you let, enquire about letting, or have been contacted by us about letting, a holiday property in the UK through us, visit our UK based websites or register to use our app in the UK. Awaze Vacation Rentals Ltd can be contacted about data protection issues by email to [datachanges@awaze.co.uk](mailto:datachanges@awaze.co.uk)
- Vacation Rental SARL if you let, enquire about letting, or have been contacted by us about letting, a holiday property in France through us. Vacation Rental SARL can be contacted about data protection issues by email to [datainformation@awaze.com](mailto:datainformation@awaze.com)
- Awaze A/S if you let, enquire about letting, or have been contacted by us about letting, a holiday property in the rest of Europe through us, visit our European (excluding UK) based websites or register to use our app outside of the UK. Awaze A/S can be contacted about data protection issues by email to [datainformation@awaze.com](mailto:datainformation@awaze.com)

We keep our privacy notice under review and we will place any updates on our webpage. We will contact you to let you know about any significant changes.

*2. What personal information we process and why?*

We will only process personal information about you when we need to and this may include:

- **Personal details** such as your name, contact details (phone number, email address and home address), owner ID, date of birth and your username and password
- **Financial details** such as payments made to and from you, your bank account details and tax identification number where required
- **Letting details** such as the contract to let your holiday property through us, details about your holiday property and a license/registration/permit number or similar in locations where this is required
- **Contact history** such as emails, letters, live chats, call recordings and social media messages to and from you
- **Usage details** such as IP address, device type, device ID, how you use or interact with our website, emails, content, ads or app (e.g. pages visited, links clicked and properties viewed). Please see our Cookie Policy (a link can be found at the bottom of this page) for more information about this.

The provision of some personal information is a legal or contractual requirement and if you do not provide it, we may not be able to enter into or perform the contract with you and we can cancel our service to you. We will tell you if this is the case and will not be liable to you.

We may also collect and process the contact details of any third party that you appoint, such as a property caretaker or cleaner, that you share with us. If you provide such information to us, you must ensure that you have brought this privacy notice to the third party's attention.

We will generally collect personal information directly from you. We may sometimes collect personal information from a someone who you have agreed to refer you to us, the accommodation owner (for example, if you are appointed as a caretaker or cleaner), publicly available sources and companies involved in building or selling holiday properties.

We may use your personal information for any of the purposes explained below, depending on how you interact with us.

<b>Purpose for processing</b>	<b>Personal data used</b>	<b>Lawful basis for processing</b>
To enable us to let your holiday accommodation, including making payments and provide related services such as referring you to a hot tub supplier with your agreement	Personal details, payment details, letting details	Contract Consent
To manage your online account with us	Personal details, letting details, payment details	Consent Legitimate interest in providing good customer service
Keep a record of any financial transactions with you	Payment details	Legal obligation



To send service messages, including booking updates and changes to our terms and conditions	Personal details	Contract Legitimate interest in keeping our customers updated
To allow you to communicate with guests that have booked your property we may share your contact details. Alternatively, we may mask your contact details and direct communications via our communication channels. We may analyse these communications to investigate potential breaches of our terms, fraud or security issues and for product development. We reserve the right to review or block the delivery of communications that we believe might breach our terms, contain malicious content or spam, or pose a risk to you or others.	Contact history	Legitimate interest in allowing communication between guests and owners of properties, ensuring these communications are secure and comply with the law and our terms and improving our business
To reward our owners, for example, by sending a gift to you	Personal details	Legitimate interests in maintaining a good relationship with our owners
To invite you to complete surveys about your letting experience	Personal details	Legitimate interests in gaining insights about your letting experience and improving our services
To provide details or information you may have requested	Personal details	Consent
Provide and improve our customer service and support, including quality control and training	Personal details, letting details, contact history	Legitimate interest in improving our service, staff training, record keeping and resolving issues
To personalise our services to you, for example, where allowed, we may identify you when you visit our website or app so that we can remember your preferences and previous actions e.g. language settings.	Usage details	Consent Legitimate interests in providing the best browsing experience
Monitor our website and app, including its performance and security and, where allowed, analysing the behaviour of visitors to our website and app so that we can protect and improve our website and app.	Usage details	Consent Legitimate interest in maintaining the integrity and security of our website and app and providing the best browsing experience

<p>To carry out marketing activities. As well as sending promotional materials and our newsletter, we also use letting and usage details to send personalised advertisements and display these on websites and social media to you or similar audiences. As part of this we provide hashed information to third party advertising partners such as Facebook and Google.</p>	<p>Personal details, letting details, usage details</p>	<p>Consent Legitimate interests in working out which of our services you may be interested in and telling you about them</p>
<p>For analytics and product improvement. This includes testing, addressing security or technical issues, data analysis, statistics, improving our website and app and developing new products and services. We use anonymised data to do this where possible, but may need to use personal data on occasion e.g. if you are experiencing a technical issue with our website, we may need to use information about your device</p>	<p>All data</p>	<p>Legitimate interests in evaluating our range of services and improving our business</p>
<p>For legal purposes. This includes handling legal claims, ensuring compliance with our rental conditions and other agreements, complying with government advice, regulatory requirements and legal obligations and detecting, preventing and reporting crime.</p>	<p>All data</p>	<p>Legal obligation Legitimate interest in protecting our business and assisting law enforcement and government bodies</p>

### 3. *Sharing your data within the Awaze group*

We are part of the Awaze group of companies (listed at [www.awaze.com](http://www.awaze.com)) and we sometimes use joint technology and may share your personal data with other companies in the Awaze group, their employees, contractors and service providers. This does not affect the purposes we use your personal data for and, includes:

- to enable us to let your holiday accommodation, including listing your property on different Awaze group booking platforms;
- providing customer service;
- detecting, preventing and reporting crime;
- monitoring our website and app; and
- marketing activities where permitted.

We also share anonymised data for analytics and product improvement. We rely on our legitimate interests in providing a good service, improving our service and protecting our business to share within the Awaze group. Group companies either act as our processor or joint controller and we have an intra group data sharing agreement in place to ensure the data is secure and handled in line with applicable laws.

#### *4. Sharing your data outside the Awaze group*

To effectively provide our services and run our business, we may share your personal information with:

- individuals who may be renting accommodation from you (this may include your phone number, email address and home address where it is necessary in relation to the booking e.g. if you are in charge of handing over the key or an individual needs to contact you about their stay or to resolve any issues)
- service providers, acting as processors, who provide IT, system administration, website and app hosting and support, marketing, customer support and cleaning and maintenance services
- professional advisors, including bankers, lawyers, auditors, accountants and insurers who provide us with services
- third party advertising partners and travel agents
- credit/debit card companies
- payment service providers
- government agencies, regulators and other authorities
- third parties that we may choose to sell, transfer, or merge parts of our assets or business to or with and businesses we acquire or merge with
- third parties you have authorised us to speak to

Third parties are required to process your personal information in line with data protection legislation. Where a third party is acting on our behalf, we do not allow them to use your information for their own purposes and we ensure they have appropriate security measures in place to protect your information.

#### *5. International transfers*

We are a global business and use suppliers located across the world. This means that sometimes we need to transfer your personal information outside of the UK and EU. We only do this where we are satisfied that there are adequate measure in place to protect your personal information in a way that is consistent with, and respects, UK and EU data protection legislation. We will ensure at least one of the following safeguards is implemented:

- an adequacy decision; or
- approved contractual measures and where necessary, supplementary measures.

If you would like further details of the applicable transfer mechanism, please contact us.

#### *6. How long we keep your information for*

We will only keep your information for as long as necessary based on the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, any legal or regulatory requirements and any relevant industry standards or guidelines. Where your information is no longer

required, it is disposed of or deleted in a secure manner or anonymised so that it can no longer be associated with you.

### *7. Your rights*

Under certain circumstances, you have the right to:

- **Request access** to a copy of the personal information we hold about you (commonly known as a "subject access request").
- **Request that we correct any inaccurate or incomplete** personal information that we hold about you.
- **Request that we delete** your personal information where there is no good reason for us continuing to process it (commonly known as the "right to be forgotten").
- **Object to us using your data** for direct marketing or, in some circumstances, using it for legitimate interests.
- **Request restriction** of the processing of your personal information. This enables you to ask us to limit the way we process your personal information, for example if you dispute the accuracy of the information we hold about you.
- **Request data portability**, whereby we transfer the personal information you have provided to us, either directly to you or a third party.
- **Withdraw your consent** where we rely on your consent to process your information.

There is no fee to exercise your rights, unless your request is unfounded or excessive, in which case we may charge you a reasonable fee or refuse to comply with the request. We may need to request information from you to help us confirm your identity and identify the information you are referring to.

If you wish to exercise any of these rights, please contact us. We aim to respond to requests within one month, but where permitted we may extend this by two months and will notify you of this.

You also have the right to raise concerns about our use of your personal information with the relevant supervisory authority, such as the Information Commissioner in the UK (<https://ico.org.uk>) or Datatilsynet in Denmark (<https://www.datatilsynet.dk/>), at any time, but we encourage you to contact us in the first instance so that we may discuss your concerns.