# Tignes-Lavachet Privacy Policy

# 1. INTRODUCTION

This Privacy Statement applies to the processing by us Tignes-Lavachet of your (our guests') personal data. Your privacy is important to us and we treat all your personal data with great care. We act in accordance with the applicable data protection legislation.

When you make a reservation or contact us we collect information from and about you. Some of the information we collect may be classed as personal data under data protection legislation, that is, "any information relating to an identified or identifiable natural person". It may be collected any time you submit it to us, whatever the reason may be.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by us. It also states which rights you have under applicable data protection legislation.

## PARTICULARLY IMPORTANT INFORMATION

**WHO WE ARE:** For the purpose of applicable data protection legislation, the data controller of your personal data is Tignes-Lavachet, 2 Sondes Place Drive, Dorking, RH4 3EG, United Kingdom.

We draw your attention in particular to the sections entitled "International Data Transfers" and "Your Rights."

# 2. COLLECTING YOUR PERSONAL DATA

We collect information about you in the following ways.

Information you give to us. This includes personal data collected:

- When you email us or contact us in other ways to enquire about or to make a booking.
- When you provide feedback.
- When we do business with you, which will usually include:
  - Full or partial contact details including names and addresses, telephone and email details.
  - $\circ$   $\;$  We may collect proof of age, or other proof of exemption from local taxes.

# 3. WHY DO WE PROCESS YOUR PERSONAL DATA?

Your personal data will be stored in password protected systems under our control, and/or in hard copy at a location under our control.

We use the information we collect about you to process your bookings and answer your queries. All personal information collected during bookings will be used solely for processing the booking. We will only pass your details to third parties where we need to in order to fulfil the booking i.e. passing your details to our partners in resort in order to arrange entry to the apartment. Otherwise we will not reveal your details to any third party and we will not use your details for marketing purposes.

### When you stay at the apartment

When you make a reservation, you will have to provide us with your name, email address, phone number and the dates you are staying with us. We use this personal data to process the reservation and to allow us to communicate with you about your reservation.

We may use your personal data but only to the extent the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to fulfil the booking you are about to make, or have made with us.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

For your convenience, we have made an overview of activities that involve the processing of your personal data, and the corresponding legal basis/legal bases that allow us to process this data:

	Purpose/activity	Legal basis
1.	We store the personal data you provide to us in our systems or on paper for administrative purposes.	<ul> <li>consent, where required</li> <li>fulfil a booking you have made or are about to make</li> </ul>
2.	Government regulations require us to ask you to provide us with certain information. This may include information such as: birth date, nationality, place of residence, date of arrival.	<ul> <li>compliance with a legal obligation</li> </ul>
3.	We may have to verify a guest's exemption from local taxes (e.g. Taxe de Sejour). We will use your passport or other identification document. We will not store a copy of your passport, except to the extent permitted by law.	<ul> <li>compliance with a legal obligation</li> </ul>
4.	We store your personal data in our systems and/or on paper, also after your transaction has been completed and after you have stayed in the apartment to the extent required by law.	<ul> <li>compliance with a legal obligation</li> </ul>
5.	We process your booking via a third party (online) travel agent.	<ul> <li>enter into, or fulfil, a booking with you</li> </ul>
6.	We engage in activities required for compliance with legal obligations, third party claims or requests from public authorities, such as (i) the mandatory storage/containment of certain information because of a criminal investigation, (ii) requests from third parties for access to information (iii) any further instructions from third parties, such as supervisory authorities, that involve data processing.	<ul> <li>consent (if required)</li> <li>enter into, or fulfil, a booking with you</li> <li>compliance with a legal obligation</li> </ul>

# 4. SHARING YOUR DATA

We may share your personal data as follows:

- **Our third party partners in Tignes**. We may share your personal data with our third party partners in resort so that you are able to get access to the apartment, and that issues and queries can be dealt with promptly and efficiently during the course of fulfilling the booking you have with us. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data. Third parties are subject to confidentiality obligations and may only use your personal data to perform the necessary functions and not for other purposes.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We do not share your data with any third parties outside of the above arrangements.

# **5. INTERNATIONAL DATA TRANSFERS**

We are based in the United Kingdom, and the apartment is based in France, so it may be necessary to transfer your personal data overseas. Any transfers will be made in full compliance with all aspects of the applicable regulations.

#### **6. YOUR RIGHTS**

The GDPR provides the following rights for individuals:

#### **Right to revoke consent**

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

#### **Right of access to your information**

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by sending an email to <u>rachel@tignes-lavachet.co.uk</u>. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

#### Right to rectification and erasure of data, and restriction of processing

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by sending an email to <u>rachel@tignes-lavachet.co.uk</u>.

# **Right to data portability**

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

## **Right to object**

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. You can do this by sending an email to <u>rachel@tignes-lavachet.co.uk</u>, or by writing to:

Tignes-Lavachet, 2, Sondes Place Drive, Dorking, Surrey, RH4 3EG, United Kingdom

## General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law.

We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may either (i) charge you a fee, or (ii) refuse to process your request. With respect to access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

## 7. PROTECTION AND STORAGE OF YOUR DATA

We will use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be stored on password protected systems and subject to physical security measures. A strictly limited amount of people have access to your personal data.

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. COOKIES

Our website does not use cookies.

#### 9. RETENTION OF INFORMATION

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement. The length of this retention period is as required or permitted by law (usually our obligations under tax law).

#### **10. GENERAL**

We are committed to resolve any complaints about our collection or use of your personal data. In case you have any questions in relation to this Privacy Statement or our practices in relation to your personal data you may send an email to <u>rachel@tignes-</u><u>lavachet.co.uk</u>. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to

contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

We have done our best to make sure that this Privacy Statement explains the way in which we process your personal data, and rights you have in relation thereto. We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information.