

PRIVACY POLICY

HOLIDAY ACCOMMODATION CUSTOMERS

Last updated January 2023

Merdeka Homes Ltd and its Directors ("Company", "we", "us", or "our") are committed to protecting your personal information and your right to privacy. When you visit our websites <https://www.myrunswickbay.co.uk> and more generally, use any of our services (the "Services", which include our Tailormade Packages on the Websites), we appreciate that you are trusting us with your personal information. This privacy notice applies to all information collected, as well as any related Services, marketing, or events. Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

WHAT INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

In Short:

- We collect information (full name, address, postcode, email address, telephone or mobile number) that you provide to us through email, website or social media.
- We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activity on the Website or otherwise when you contact us.
- The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use.

The personal information we collect may include the following:

We collect names; phone numbers; email addresses; mailing addresses and emergency contact details.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short:

Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.

We automatically collect certain information when you visit, use, or navigate the Website.

This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information.

This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Other information we collect

In short:

We collect bank details through our data processor Paypal and/or Stripe. Details to enable payment of your holiday booking are collected securely through Paypal and/or Stripe. We do not store credit card information and the Company is PCIDSS compliant. Like many businesses, we also collect information through cookies and similar technologies.

Do we collect information from minors?

In Short:

We do not knowingly collect data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 years of age or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If you become aware of any data we may have collected from children under the age of 18, please contact enquiries@myrunswickbay.co.uk

HOW DO WE USE YOUR INFORMATION?

In Short:

- We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.
- We use personal information collected via our Website for a variety of business purposes described below.
- We process your personal information for these purposes in reliance on our legitimate business interests, to enter or perform a contract with you, with your consent, and/or for compliance with our legal obligations.
- We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

To post testimonials.

- We post testimonials on our Website that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at enquiries@myrunswickbay.co.uk and be sure to include your name, testimonial location, and contact information.
- Request feedback. We may use your information to request feedback from any of our services or products (Rating Star) and to contact you about your use of our Website www.myrunswickbay.co.uk
- To send administrative information to you. We may use your personal information to send you information about changes to our terms, conditions, and policies.
- To protect our Services. We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).

- To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements.
- To respond to legal requests and prevent harm. If we receive a legal request, we may need to inspect the data we hold to determine how to respond.
- Fulfil and manage your payments. We may use your information to fulfil and manage your payments or cancellations made through our online booking system.
- To send you marketing and promotional communications or administer prize draws and competitions.
- We may use your information to administer prize draws and competitions when you elect to opt-in to our marketing or sign up to our monthly newsletters. You can opt-out of our marketing emails at any time.
- To respond to user enquiries/offer support to users.
- We may use your information to respond to your enquiries and solve any potential issues you might have with the use of our Services.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short:

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations. We may process or share your data that we hold on the following lawful bases:

- Your consent:
 - We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- We have a legitimate interest:
 - We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Contractual obligation:
 - Where we have entered a contract with you, we may process your personal information to fulfil the terms of our contract.
- Legal obligation:
 - We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, or legal process such as in response to a court order (including in response to public authorities to meet national security or law enforcement requirements).
- We have a vital interest:
 - We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies. Our Websites may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you

provide whilst visiting such sites and such sites are not governed by this privacy notice.

WHO MAY YOUR INFORMATION BE SHARED WITH

In Short:

We only share information with the following third parties.

- Web Analytics Google Analytics and Wordpress Stats
- Website Hosting WordPress.com (inc Wordfence)
- Website Testing Cloudflare
- Newsletter (Database management) Mailchimp
- Website Usage Google Analytics

We may need to process your data or share your personal information in the following situation:

- Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third-party service providers or agents who perform services for us or on our behalf and require access to such information to do that work. Eg: payment processing, data analysis, email delivery, third party activity partners for our Tailormade Packages, customer service or marketing efforts. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short:

- We may use cookies and other tracking technologies to collect and store your information.
- We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and you can refuse certain cookies.

HOW LONG DO WE KEEP YOUR INFORMATION?

In Short:

We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law. No purpose in this notice will require us keeping your personal information for longer than necessary according to GDPR guidelines. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information.

HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short:

We aim to protect your personal information through a system of organisational and technical security measures. We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. Although we will do our best to protect your personal

information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment

WHAT ARE YOUR PRIVACY RIGHTS?

In Short:

You may review, change, or terminate your account at any time. In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. In some regions (such as the EU), you have certain rights under applicable data protection laws. If you are resident in the EU and you believe we are unlawfully processing your personal information, you have the right to complain to your local data protection supervisory authority:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are resident in Switzerland, the contact details for the data protection authorities are: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Cookies and similar technologies

In short:

Most Web browsers are set to accept cookies by default. These are small data files generated by the website and stored on your computer to assist the website to work and display information correctly. Cookies are also used to:

- Remember settings
- Remember information you give to the website
- To measure how you use the website.

You can choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website. To learn more about cookies and how to manage them go to

<https://www.aboutcookies.org.uk>

YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

- Your right of access
 - You have the right to ask us for copies of your personal information.
- Your right to rectification
 - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure
 - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing
 - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- Your right to object to processing
 - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability
 - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights.

To request to review, update, or delete your personal information, please visit:
www.myrunswickbay.co.uk. We will respond to your request within 30 days.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at: enquiries@myrunswickbay.co.uk or by Tel: 07734 023826.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Wilmslow, Cheshire SK9 5AF.

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

We may update this privacy notice from time to time and in line with any future Government guidance or changes to GDPR as set out in the Data Protection Act (2018).