**PRIVACY POLICY**

If you (either as an individual or as part of a group booking) are seeking to rent one of our properties or to obtain details about a potential holiday, we will usually collect the minimum information required to fulfil your needs. This will likely include your name, contact details, payment details, date of birth, details of other members of your party plus information on your specific requirements in order to customise your holiday and deliver your specific requirements.

If you sign up to join our mailing list we will collect your name and email address, together with your consent to receive communications from us. This consent can be removed at any time simply by using the unsubscribe button on any of our email communications.

We collect, store and use your personal details as outlined above for our legitimate business interests, so that we can fulfil both your immediate and any potential future holiday booking or enquiry needs. This storage and use of your personal data allows you to be contacted about both your current booking or enquiry.

Where you are completing a booking on behalf of other people, this Privacy Policy will apply to all personal data provided and you are required to bring this Privacy Policy to their attention so that they are also informed of how we will process their personal data.

We will disclose information under the following circumstances:

Third-party service providers: When we share information with third-party service companies for them to facilitate or to provide certain services on our behalf. This will include:

IT support service providers;

third-party service providers who track our customers' use of the sites and our services for us.

other third-parties who we may need to work with to deliver services and/or facilitate your booking and holiday (including any holiday extras), for example, providers of property management services (including, but not limited to, housekeeping, property maintenance etc).

These third-parties are contracted to use your personal data only as necessary to provide the relevant services to us and are required to maintain full security and confidentiality.

Compliance with laws and legal proceedings: When we respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. When we believe it is necessary to share information in order to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law.

Merger or acquisition: When we need to transfer information about you if we are acquired by or merged with another company.  If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified by email and/or a prominent notice on our sites of any change in ownership or uses of your personal data, as well as any choices you may have regarding your personal data. 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 Policy.

In some, relatively limited, circumstances we need to handle your personal data in a certain way to be able to comply with our legal obligations – for example: if we are requested to disclose your personal data to regulatory bodies or if we need to demonstrate our compliance with applicable law such as any tax and national insurance legislation relating to the payment of personal service company contractors and immigration law.

We retain information (including personal data) for the minimum reasonable time period to allow us to provide our services and to comply with legal requirements which require us to retain transactional records for six years following the end of the tax year in which you last interact with us. The only exceptions are in cases where we need to keep limited personal data to resolve ongoing disputes, or enforce our agreements.

**Supporting the NHS Test and Trace system**

This section has been added 14 April 2021 following legislation changes to explain the extent to which we use your data to support the NHS Test and Trace System.

The lawful basis for processing your personal data for NHS Test and Trace has changed from legitimate interest to legal obligation.

You no longer have the right to opt out of sharing your details for the purpose of NHS Test and Trace.

What information do we collect?

We may record your contact information when you visit any of our properties including:

Name, Telephone number or email address, Date of visit, arrival time and departure time

You should use the option, where available, to ‘check-in’ using the official NHS QR code in order to provide your contact details. If you are using the NHS app then The Original Cottage Company will not be directly processing your data and you should consult the NHS app privacy policy for further information.

How will your information be used?

We will only use this information for the purpose for which it has been collected. Where it is necessary for us to collect information which we would not normally collect in our usual course of business it will only be used for the purposes of NHS Test and Trace. We will not use this information for any other purpose such as marketing.

The legal basis for using your information

Processing your personal data for the purposes of NHS Test and Trace is necessary for The Original Cottage Company to comply with its legal obligation as set out in the Health Protection (Coronavirus, Collection of Contact Details etc and Related Requirements) Regulations 2020.

Who will your information be shared with?

NHS Test and Trace will only ask The Original Cottage Company for this information where it is necessary, either because someone who has tested positive for COVID-19 has listed one of our properties as a place they visited recently, or because one of our properties has been identified as the location of a potential local outbreak of COVID-19.

We will only share this information when it is requested by NHS Test and Trace. We will ensure that this information is shared in a safe and secure way.

Where information is shared with NHS Test and Trace the Department of Health and Social Care (DHSC) will be the data controller for the information at the point it receives the data from The Original Cottage Company. The DHSC Privacy notice for maintaining records to support NHS Test and Trace is available at <https://www.gov.uk/government/publications/privacy-notice-for-maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace/privacy-notice-for-maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace>

How long will we keep your information?

Information that is collected solely for the purposes of NHS Test and Trace will be retained for 21 days from the departure date of your visit after which time it will be automatically and securely deleted.

Your rights

The NHS Test and Trace Scheme helps us to keep you safe. The Original Cottage Company is required by law to record and share your data if it is requested by the NHS, in order to participate in this scheme.