

VILLASDIRECT.COM – PRIVACY POLICY

1. WHAT THESE TERMS COVER

1.1 Who we are.

We are Villasdirect Limited, a company registered in England and Wales trading as VILLASdirect.com with company registration number 07929131 and registered office at 71-74 Shelton Street, Covent Garden, London WC2H 9JQ (we/us/our). For the purpose of the Data Protection Act (the Act) we are registered with the Information Commissioner's Office as a data controller under registration number ZA091375 and our nominated representative is ICO. Our registered VAT number is GB 135 8122 26.

1.2 This policy sets out how we may process any personal data we collect from you, or that you provide to us or that is provided to us by any of our approved travel agents who is acting on your behalf (Travel Agent). It should be read in conjunction with our standard customer terms (Customer Terms) which are set out at www.VILLASdirect.com (the Site). Unless otherwise specified, any capitalised terms used in this policy shall have the meanings defined in the Customer Terms.

1.3 By visiting the Site you agree to accept and consent to the practices set out in this policy and by using this site,

1.4 This site is using the Google Maps API(s) and users are referred to the [Google Privacy Policy](#).

2. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

2.1 Information you give us directly by telephone, e-mail, post or by logging into the Site, including without limitation contact and payment details that are reasonably necessary to make or manage any property rental booking between a Customer (either directly or via their Travel Agent) and a Property Manager that we have facilitated via the Site (Booking);

2.2 Information about you that we receive via your Travel Agent in order to make, pay for or manage a Booking on your behalf;

2.3 Information we collect about you each time you visit the Site, namely:

(a) technical information such as the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

(b) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

2.4 Information we receive from other sources. We may receive information about you if you use any other website that we operate or other service we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site. We may also receive information about you from any Third Party (as defined in clause 5.2) in connection with operating the Site.

3. COOKIES

3.1 The Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site and allows us to improve the Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy at <http://www.VILLASdirect.com/resources/static/cookiepolicy.pdf>

4. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

4.1 Information you give to us. We will use this information:

- (a) to carry out our obligations arising from any Bookings entered into between you and a Property Manager
- (b) to connect you with one of our approved travel agents to assist you in finding a suitable property and in making a Booking;
- (c) to determine whether any commission is payable to a Travel Agent in connection with your Booking;
- (d) to provide you with the information, products and services that you request from us;
- (e) to provide you with information about other goods and services we offer that are like those that you have already purchased or enquired about;
- (f) to notify you about changes to your Booking, the Site or any other service we offer;
- (g) to ensure that content from that Site is presented in the most effective manner for you and for your computer or other device.

4.2 Information we collect about you. We will use this information:

- (a) to administer the Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (b) to verify whether the location specified in your online account is different to the location of your IP address, for the purpose of optimising the services provided by the Site and assessing commission payable to our approved travel agents;
- (c) to improve the Site to ensure that content is presented in the most effective manner for you and for your computer;
- (d) to allow you to participate in any interactive features of our service, when you choose to do so;
- (e) as part of our efforts to keep the Site safe and secure;
- (f) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- (g) to make suggestions and recommendations to you and other users of the Site about goods or services that may interest you or them.

4.3 Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

4.4 We will not pass your information to anyone other than the Third Parties referred to above without your prior consent or where it is necessary to do so for legal or compliance reasons.

5. DISCLOSURE OF YOUR INFORMATION

5.1 We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

5.2 We may share your information with selected third parties in order to facilitate a Booking or otherwise provide the services referred to in the Customer Terms (each a Third Party) which may include:

a) Any Property Manager, Travel Agent, payment processor or any other subcontractor or third party involved in making or managing a Booking;

(b) Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1) We may make use of the personal data we have collected from you to enable us to help to comply with our advertisers' wishes by displaying their advertisement to that target audience;

(c) Analytics and search engine providers that assist us in the improvement and optimisation of the Site.

(d) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Customer Terms. This may include exchanging information with other companies and organisations for the purposes of fraud protection or credit risk reduction.

5.3 If we send EEA Data to a Third Party that is located or will be processing that EEA Data outside of the EEA, then we will require such Third parties to agree to provisions materially similar to those referred to in the European Commission Decision of 5 February 2010 on standard contractual clauses for the transfer of personal data to processors established in third countries under the EU Data Protection Directive as a condition to receiving such EEA Data.

5.4 If we or substantially all of our assets are acquired by a third party, personal data about our customers will be one of the transferred assets.

6. WHERE WE STORE OR PROCESS YOUR PERSONAL DATA

6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

6.2 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6.3 All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted by our third-party payment processor. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. YOUR RIGHTS

7.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at support@VILLASdirect.com.

7.2 The Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. ACCESS TO INFORMATION

8.1 Data protection legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

9. CHANGES TO OUR PRIVACY POLICY

9.1 Any changes we may make to this policy in the future will be posted on the VILLASdirect website. In certain circumstances we may notify you of changes by e-mail. Please check back frequently to see any updates or changes to this policy.