
LOVETOESCAPE GDPR PRIVACY POLICY

About This Privacy Policy:

Lets Portal Ltd trading as LovetoEscape (Lovetoescape.com) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.lovetoescape.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site and you will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions

In this Policy the following terms shall have the following meanings:

"Data controller" determines we the organisation controlling the purposes and means of processing personal data;

"Data processor" being the processor responsible for processing personal data on behalf of a controller;

"Data subject" means a natural person;

"Third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

"Account" means an account acquired to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Area 14, below; and

"Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Who Are We?

Our Site is owned and operated by Lets Portal Ltd registered in Scotland under company number SC321819

- Registered address: 5 South Charlotte Street, Edinburgh, Scotland, EH2 4AN
- Main trading address: Arngomery Court, Kippen, Stirling, FK8 3EN
- VAT number: 911 5230 67
- Email address: contact@lovetoescape.com
- Telephone number: 01786 871246
- Postal Address: Arngomery Court, Kippen, Stirling, FK8 3EN
- ICO registration number: Z1050366

3. **About This Policy**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Section 15.
- b) The right to access the personal data we hold about you. Section 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Section 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Section 15.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

6. What Data Do You Collect?

We have a number of lawful reasons that mean we can use (or/and 'process') your personal information. Our primary lawful reason is “**Legitimate interest**” meaning the interest of our business to provide products or services to you.

Depending how your use of Our Site, we may collect some or all of the following personal and non-personal data detailed below. You may give us information about yourself by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, participate in social media functions on our site, enter a competition, promotion or survey.

- **Personal identification:** name, title, postal addresses, phone numbers, email addresses, phone numbers.
- **Account login details:** email address, password (which is stored on encrypted form).
- **Bookings and Booking Enquiries:** accommodation booked, holiday start/end dates, cost of holiday, amounts paid, or booking/availability enquiries.
- **Insurance:** if you have purchased cancellation insurance with your booking on our site, which is provided by J L Morris (see 10.ii for more information)
- **Browsing:** the IP addresses you use to access our services (web browser type and operating system version).
- **Specific to accommodation providers:** address of your property, historical and future bookings information, photographs of your property.
- **Communication:** emails, customer service matters, competition entries, your interaction with our marketing (clicking links in our marketing emails, for example – we track this to help ensure our communications are relevant and interesting). We use MailChimp to process data and to store information.
- **Electronic identifiers:** cookies, IP addresses. These electronic identifiers are essential to enable you to log into your online account and to assist you if you encounter difficulties using our online services. You can disable cookies if you wish, but this will hamper our ability to provide online services securely.
- **We work with leading industry partners and third parties:** In such cases, those companies must also inform you about their use of your data.

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be as follows;

Legitimate interests: It is in our legitimate business interests to use data to manage our operations and to make business process improvements. This is our primary lawful reason for data collection and management (as stated in 6. above).

Consent: You have consented to our use of your data for certain types of processing (e.g. marketing activities)

Contract: The data is necessary for our performance of a contract with you (i.e. in relation to your holiday booking)

Legal obligation: We are required to do so to comply with a relevant legal or regulatory obligation (e.g. with regulatory bodies and law enforcement bodies, including the police)

Your personal data may be used for any of the following purposes:

- Providing and managing your access to Our Site
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time)
- Provide information regarding holiday accommodation and attractions
- Providing your holiday enquiry or booking and where applicable, facilitate purchasing cancellation insurance
- We hand over payment card processing to WorldPay (UK) Limited to ensure your transactions are as secure as possible
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you
- Personalising and tailoring our products and/or services for you
- Communicating with you, including responding to your emails, messages on social media, web chat requests, handling customer service enquiries
- Ensure you can log into your online account with us and managing your member Account
- Keeping our members and subscribers informed and to provide information, news, benefits and discounts
- Understanding your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience
- We may share your personal information with insurers who provide services to us to help us administer the products and services we offer
- With your request, send you relevant marketing information on our products and/or services, news, details of competitions, and accommodation we think will be of interest to you
- Manage competitions, promotions and special offers in which you participate
- Make sure our servers and websites are operating correctly
- Detect and prevent fraud or abuse of our services

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties whose content appears on Our Site may use third-party Cookies, as detailed below in Section 14. Please refer to Section 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

8. How Long Will You Keep My Personal Data?

We keep your personal data for no longer than reasonably necessary and we only retain your data in light of the reason(s) for which it was first collected, using the following criteria to determine how long to retain your personal data; Process of Bookings and Payments, Term of Membership Subscription.

9. How and Where Do You Store or Transfer Personal Data?

We only keep your personal data for as long as we need to in order to use it as described, however (in the event that you make a request, we may not be able to delete data if there is a legal or regulatory requirement to keep it).

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure any data we hold about you (even if it is only your email address). We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

Where we transfer your data to a third party based in the US, this is protected as they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Section 15 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

10. Do You Share My Personal Data?

We may share your personal data with other companies for the purposes of providing your holiday enquiry or booking.

We may sometimes contract with the following third parties to supply certain products and/or services. These may include holiday enquiry processing, delivery, payment processing and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

- i. Accommodation Service Providers and Attraction Business Providers. We share your information with our third party Service Providers, who provide and support our services. For example, if it is necessary to provide you something you have requested. Just like with the other third parties we work with, these third party Service Providers enter into a contract that requires them to use your personal data only for the provision of services to us and in a manner that is consistent with this policy.
- ii. JL Morris (Insurance Brokers), for the purposes of providing holiday Cancellation Insurance where purchased. JL Morris (Insurance Brokers) Ltd, Manor House, 1 Macaulay Road, Broadstone, Dorset BH18 8AS. JL Morris are authorised and regulated by the Financial Conduct Authority (FCA) for the purposes of arranging and managing insurances, Registration Number 306499.
- iii. VisitScotland, for the purposes of delivering holiday accommodation, providing details of accommodation, photographs and delivering our web booking engine.
VisitScotland Ocean Point One 94 Ocean Drive Edinburgh EH6 6JH
- iv. WorldPay (UK) Limited, for the purposes of processing card payments.
WorldPay (UK) Limited The Walbrook Building London EC4N 8AF
- v. MailChimp, for the purposes of marketing, processing and storing email contact data:
The Rocket Science Group, LLC 675 Ponce de Leon Ave NE Suite 5000 Atlanta GA 30308 USA

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Section 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Section 9.

11. How Can I Control My Personal Data?

In addition to your rights under the GDPR, set out in Section 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in Our emails and/or, at the point of providing your details.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

12. Can I Withhold Information?

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Section 14 and our Cookie Policy.

13. How Can I Access My Personal Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, we will provide any and all information in response to your request free of charge. To contact us about anything to do with your personal data and data protection, including to make a subject access request, you will need to contact us by email or post, to exercise these rights. Please use the contact details found in Section 15.

14. How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times. All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a clear prompt requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up to date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. How Do I Contact You?

Questions, comments and requests regarding this privacy policy should be sent to our registered address or via email. Please provide GDPR ENQUIRY on the subject line:

Email address: contact@lovetoescape.com

Postal address: Arngomery Court, Kippen, Stirling, FK8 3EN

16. Changes to this Privacy Policy

Any changes we may make to our privacy policy in the future will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to see any updates to our privacy policy.