

PRIVACY POLICY AND COOKIE POLICY
VERSION DATED SEPTEMBER 19, 2022

We are Perfectstay Travel Ltd, whose company number is 11320606 and whose registered office is at Chase Green House, 42 Chase Side, Enfield, Middlesex EN2 6NF (“Us”, “We, “PerfectStay”).

We advertise travels offers on the website <https://holidaypirates.perfectstay.com/en-GB> as part of a white-label partnership with Holiday Pirates. The website with travel offers is published exclusively by our website, PERFECTSTAY.COM (“the Website” and additionally defined below, under ‘Definitions’), and sales are made and managed exclusively through the Website, by us.

We are committed to protecting your personal data and the purpose of this Privacy Policy is to (a) provide you with clear, easy to access and transparent information concerning the origin and use of the information we process and the rights you have, and (b) define the General Terms and Conditions of use for the Website. This Privacy Policy also explains how We manage cookies and how to manage your cookie settings, and describe how the Website collects, stores, processes, shares or transfers your personal data. This Privacy Policy shall apply whenever you visit the Website, or when you place an order in accordance with our General Terms and Conditions of Sale.

By using the Website, you accept the terms of this Privacy Policy. This Privacy Policy may be amended to reflect changes in the Applicable Laws (defined below) or to our services. The new Privacy Policy will apply as of its date of publication. If it contains significant changes we will inform you of those changes.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

We keep our Privacy Policy under regular review. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

1. DEFINITIONS

“*Client*”: refers to any client having placed an Order.

“*Order*”: refers to any reservation of a service carried out by a Client via the Website, by telephone or in one of our partner agencies.

“*Personal Data*”: refers to information relating to an identified or identifiable person i.e. a person who may be identified directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online user name, or one or more elements specific to his/her physical, physiological, genetic, psychological, economic, cultural or social identity.

“Applicable Laws”: all applicable data protection and privacy legislation in force from time to time in the UK including without limitation the UK GDPR (which has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018); the Data Protection Act 2018 (and regulations made thereunder) (**DPA 2018**); and to the extent EU GDPR applies, the General Data Protection Regulation ((EU) 2016/679)) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

“Processing” or any derivative: any activity that involves the use of the Personal Data. It includes, but is not limited to, any operation or set of operations which is performed on the Personal Data or on sets of the Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring the Personal Data to third-parties.

“Website”: refers to the website published by PERFECTSTAY.COM and presenting the White label services, for the internet and mobile version and also for the corresponding mobile applications.

2. HOW TO CONTACT US

Perfectstay Travel Ltd is the controller and responsible for your Personal Data.

We have a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below. If you have any questions regarding your personal data and how we may use it, including any queries relating to this Privacy Policy, please contact us at dpo@perfectstay.com or writing to our “Data Protection Officer” at the head office address noted above.

If you have any questions about this Privacy Policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Perfectstay Travel Ltd

Email address: dpo@perfectstay.com

Postal address: Chase Green House, 42 Chase Side, Enfield, Middlesex EN2 6NF

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3. PERSONAL DATA PROTECTION

The Processing of your Personal Data may be based on your consent, may be required when you place an Order so that the contract to which you are part of as a customer may be fulfilled, to ensure compliance with a legal obligation (for example obligations to keep invoices, etc.) or in pursuit of a legitimate objective (such as to improve our services or in the fight against fraud).

We implement appropriate technical and organisational measures to ensure your Personal Data is Processed in accordance with Applicable Laws and to ensure a level of security in accordance with the risks presented, thus protecting your Personal Data against loss, misuse, unauthorised access, disclosure and modification.

3.1. What Personal Data do we collect?

For the purpose of the Applicable Laws, where Personal Data is provided directly to us through use of the Website, email, meeting with you or other means of interacting with you where we are determining the way in which that Personal Data is processed, then we will be a data controller of such information.

Whether the Personal Data you provide is optional or mandatory is marked on the forms on our Website. All fields requiring mandatory information must be completed for you to gain access to our services.

In addition to the Personal Data that you provide us with, we also collect data via our services that we may provide you with. We will advise you of these before services commence.

When you browse on the Website, so long as you have authorised us to do so, we record your connection and browsing data. Subject to your consent and in accordance with the terms set out in paragraph 4 concerning Cookies, with your consent when necessary, we may record using cookies and other tracers, your IP address, the offers you have looked at, your browsing and more generally how you use the Website (**'Usage Data'**).

Customer Personal Data

As a Customer we may ask you to provide all of the following information for each person travelling, including those you represent: surname, first name, date of birth, passport information (number, date of issue, expiry date), nationality and any other relevant information required by our suppliers (**'Identity Data'**). You must confirm that you have been authorised to provide this Personal Data by each person travelling and that you hold parental responsibility for any children under the age of 16 who may be travelling.

You must also provide your telephone number so that we may contact you at any time concerning your Orders (**'Contact Data'**).

The banking information you provide us with when placing an Order is collected by our banking providers and is not stored by us (**'Financial Data'**).

We may ask you for further information to help us ensure the payment is processed correctly.

Similarly, in exercising your rights as detailed in paragraph 3.5, we may ask you for certain information in order to confirm your identity.

We may also collect:

‘Technical Data’, including internet protocol address, browser type and versions, time zone setting and location, browser plug-in types and versions and platform and other technology on the devices you use to access our Website. We may collect this from:

- analytics providers such as Google based outside the UK/EEA;
- search information providers ;

‘Transaction Data’, includes details about payments to and from you and other details of travel services you have purchased from us;

‘Special Categories of Data’ includes information relating to disabilities or medical conditions which may affect your holiday arrangements and any dietary restrictions which may disclose your religious beliefs. Special categories of data may also include ethnicity, sexual orientation or other biometric data, although it is unlikely that we will need to collect all of this type of data from you in connection with your holiday arrangements.

Failure to provide Personal Data

Where We need to collect Personal Data by law, or under the terms of a contract We have with you, and you fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter into with you (for example, to provide you with services). In this case, We may have to cancel the service you have with us but We will notify you if this is the case at the time.

3.2. Why do we collect your Personal Data?

We Process your Personal Data for the following reasons, including which of the legal bases We rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that We may process your personal data for more than one lawful ground depending on the specific purpose for which We are using your data:

Managing your Orders and our relations

When you place an order for one of our offers, the Personal Data we collect enables us to process operations relating to Client management, namely agreements, orders, invoices, accounts, monitoring of customer relationships (services ordered, amounts, dates, Order history, etc.), handling complaints, late payments and disputes and after-sales services. This will include using Identity, Contact and Transaction Data. The legal bases we rely on is performance of a contract with you, as well as necessary for our legitimate interests (to keep our records updated and to study how customers use our services).

This information may also be stored as evidence in compliance with Applicable Laws.

We also Process your Personal Data to handle your feedback and reviews on the Website.

To improve our service

Your information and data enable us to improve our service, for example by generating business statistics, studies, surveys and tests or measuring exposure (number of pages viewed, number of connections, etc.) by adapting our Website based on browsing behaviour, for use in staff training, etc. We may use Identity, Contact, Transaction and Communications Data when doing so.

We may save your preferences depending on, among other things, the offers displayed on the Website, your browsing history, and your behaviour on the Website. The legal bases We rely on is necessary for our legitimate interests (to develop our services and grow our business).

To fight against corrupt practices

Some of your Personal Data is Processed in order to identify the risks of corrupt practices associated with each Order and if necessary request further information, change the terms of payment for the Order or cancel it. The legal bases We rely on is necessary to comply with a legal obligation.

To enable us to exercise our rights

The Processing of your Personal Data may be necessary for the establishment, exercise or defence of our rights in a court of law. The legal bases We rely on is necessary to comply with a legal obligation.

To enable you to exercise your rights

We will be required to Process some of your Personal Data in order for you to exercise the rights provided for by the Applicable Laws and detailed in paragraph 3.5.

We will only use your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If We need to use your Personal Data for an unrelated purpose, We will notify you and We will explain the legal basis which allows us to do so.

Please note that We may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

3.3. How your personal data may be shared

Within the strict framework of the purposes set out in paragraph 3.2, we may communicate your Personal Data to:

- Our subcontractors who, as defined in the Applicable Laws, are those who Process your Personal Data on our instructions, on our behalf, on behalf of the Website's host, our IT providers, our payment providers, our technology-related services and advertising providers, service providers as part of competitions and promotional campaigns, etc. Some subcontractors may Process your Personal Data for the purpose of collecting your feedback following your Order and for this purpose only. Your Financial Data is managed by a third party provider in accordance with PCI DSS standards, which ensures maximum security for your payment information.

- our suppliers, such as hotels, airlines, carriers, tourism service providers, etc. who are each responsible for their own processing.
- our partners who may Process your Personal Data for their own purposes.

As such, our flight booking service providers (such as GDS Amadeus IT Group SA and Pyton Communication Service BV) are independent Data Controllers as regards your flight booking information with PERFECTSTAY.COM and they Process your Personal Data for purposes that are compatible with fulfilling orders and issuing travel tickets.

If you wish to apply to one of our third party partners for a finance package (for example payment by credit card in three or four instalments), this banking partner is responsible for the processing. However we may provide them with some Personal Data in order for you to have access to this finance.

- Authorities such as courts, the police or members of the legal profession who may ask us to disclose Personal Data as part of their mission. Your Personal Data may also be disclosed to protect our rights, your security or those of a third party or to investigate a case of corrupt practice.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your Personal Data will involve a transfer of data outside the EEA.

European Economic Area (EEA). Your Personal Data may be forwarded to a country outside the EEA that is not recognised by the Applicable Laws as having adequate safeguards. Where we do so, we will take all preliminary measures necessary to ensure that these recipients implement all appropriate technical and organisational measures to safeguard Personal Data and ensure the same level of protection as that required by the Applicable Laws, in particular through standard contractual clauses approved by the European Commission and binding corporate rules. You may request a copy of these guarantees by contacting us using the contact details specified in Article 2.

Furthermore, in the event where all or part of our company is sold or transferred to a third party, your Personal Data may be transferred to the third party in accordance with Applicable Laws.

3.4. How long do we store your Personal Data?

We store your Personal Data for no longer than is necessary for the purposes set out in paragraph 3.2 and in accordance with Applicable Law.

A Customer's Personal Data will only be retained for the time required to handle the business relationship, i.e. the time required to fulfil the Order plus three years. After this period, we will archive your Personal Data and will store it for the time required to fulfil our legal obligations, safeguards or the defence of our rights.

The Financial Data you provide us with when placing an Order is collected by our banking providers and is not stored by us.

Audience measurement statistics, information stored in your terminal (e.g. cookies) or any other element that identifies you and allows you to be traced, as well as the raw traffic data associated with an identifier, are not kept beyond the period necessary for the purposes set out in Articles 3.2 and 4.

If you exercise your right to deletion or opposition, your Personal Data will be deleted from our active database, but may be stored in our archives for the period of limitation or the period imposed by law.

3.5. What are your rights under the Applicable Laws?

In accordance with the Applicable Laws you have the right:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request the erasure** of your Personal Data in the following cases:
 - ✓ the Personal Data is no longer necessary for the purposes set out in paragraph 3.2
 - ✓ when the Processing of your Personal Data relies solely on your consent and you wish to withdraw it
 - ✓ you object to the Processing of your Personal Data for prospection purposes, including profiling when it is linked to prospecting
 - ✓ the Personal Data was unlawfully processed
 - ✓ the Personal Data must be erased to comply with a legal obligation

This right to deletion does not apply when the Processing of your Personal Data is necessary:

- ✓ In order to exercise the right of freedom of expression and information
 - ✓ for compliance with a legal obligation requiring us to Process your Personal Data
 - ✓ for statistical purposes insofar as the right to deletion is likely to make it impossible or seriously jeopardise the fulfilment of the Processing objectives
 - ✓ for the establishment, exercise or defence of rights in court
 - ✓ during the time it takes to check whether our legitimate reasons prevail over yours when you oppose, for reasons relating to your personal circumstances, the Processing of your Personal Data based on our legitimate interests.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to Processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - ✓ If you want us to establish the data's accuracy.
 - ✓ Where our use of the data is unlawful but you do not want us to erase it.
 - ✓ Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - ✓ You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- in relation to **automated decision making and profiling** where if we use either automated decision making or profiling then you have a right to know. Also, we need your consent if either of these are used to make a decision that affects you. As with all consent, you can withdraw it at any time.

To exercise your rights, please contact our DPO, using the contact details at the beginning of this Privacy Policy.

For Orders that include a flight and are carried out by the GDS Amadeus IT Group SA, you may also exercise your rights by email at the following address dataprotection@amadeus.com.

Where you exercise your right to request access to the information we process about you, you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We will respond to all data subject access requests within one month of receipt. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

3.6. Children

The Website is not intended for children and we do not knowingly collect any Personal Data from persons under the age of 18. Where, as part of the services being provided and travel arrangements being put in place, we may collect information about children from you to perform such services and we will treat such information securely. When using our Website, you confirm that you are over the age of 18 or that you have the authorisation of the holder of parental responsibility.

3.7. Complaints

If you would like to make a complaint in relation to how we may have stored, used or processed your Personal Data, you have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. COOKIES POLICY

4.1. What are cookies and what do they do?

When visiting the Website, information regarding your browsing may be recorded with your consent in files or tracers commonly called “Cookies” and that are installed on your device (computer, tablet, Smartphone, etc.). They make it possible to recognise the device you are using to make browsing the Website smoother, for example by displaying pages you have already visited quicker, saving your login details so that you don’t have to enter them again, and collecting and storing information about how you browse the Website for the purpose of showing you tailored services or ads.

When you browse the Website, Cookies may be stored by any third party that uses the technology on its own website or on our Website. In such cases, the Cookies are subject to the third party’s privacy policy (see the list of our partners and their privacy policies in Article 4 below).

You are free to accept or refuse Cookies and to change your mind at any time.

4.2. What types of Cookies do we use and for what purposes?

Depending on your choices and settings, we may store the following types of Cookies on your device:

Strictly Necessary Cookies (not optional):

Technical and functional cookies are necessary for the Website to run as smoothly as possible, to simplify your customer experience, and to allow you to use the services and features on the Website (including saving your language preferences, screen resolution and other local settings). Without these cookies, the Website will not work or will not work as smoothly as we would like; in such cases, we would be unable to provide the Website or some of the services or features requested. These cookies also help generate anonymous statistical data exclusively for us and to protect the Website against threats and fraud.

4.3. How to set Cookies?

When you visit the Website for the first time, and then regularly, a pop-up window will inform you about Cookies and you will be asked to accept them, manage your settings, or refuse cookies. Moreover, you can change your choices at any time and withdraw your consent to optional Cookies.

Cookie settings are likely to affect the conditions for accessing the Website. Refusing all Cookies can have a significant impact on accessing and using the Website.

Cookie settings from your browser

Your browser can also be set to notify you of Cookies that are placed on your device and can prompt you to accept them or not.

The configuration is described in the browser Help menu, which enables you to modify your choices regarding cookies.

Here is the procedure to follow for various browsers if you wish to disable third party cookies or to delete cookies that you have selected:

BROWSER	PROCEDURE
Google Chrome	https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en&oco=1
Firefox	https://support.mozilla.org/en-US/kb/websites-say-cookies-are-blocked-unblock-them
Internet Explorer	https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d#:~:text=Dans%20Internet%20Explorer%2C%20cliquez%20sur,internes%20et%20les%20cookies%20tiers

Cookie settings from our Website

You can change your Cookie settings or withdraw your consent at any time on the Website by clicking on the link “Cookie settings”, which can always be found at the bottom of the Website.

Please note that the following third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies:

4.4. List of our partners

Partners	Purpose of the cookie	Description	Names of the cookies
AB Tasty https://www.abtasty.com/fr/politique-protection-vie-privee/	Functional, Strictly necessary	AB Tasty is a French solution that allows to perform A/B tests on the web pages of a site. The objective is to define the variation that will work best in order to offer a better experience to the users by optimizing the ergonomic performance of	ABTasty, ABTastySessionAB TastyDomainTest

		the Site	
Hotjar https://www.hotjar.com/legal/policies/privacy/	Functional, Strictly Necessary	Hotjar is an analysis tool that helps better understand user experience on a website (for example, time spent on a page, links clicked, and more generally browsing habits, etc.). Data collected by Hotjar using cookies relate to user behaviour and their devices (in particular the IP address of the device, which is recorded and stored in an anonymous form only), the device screen size, the device type (unique identifiers), browser details, geographic location (country only), and the preferred languages used to display the Website).	_hjTLDTTest, _hjFirstSeen, _hjid, _hjAbsoluteSessionInProgress, _hjIncludedInPageviewSample
OneTrust https://www.onetrust.fr/avis-concernant-les-cookies/	Functional, Strictly Necessary	We use OneTrust to manage collecting consent to the use of cookies and other trackers.	OptanonAlertBoxClosed, OptanonConsent
Tripadvisor https://tripadvisor.mediaroom.com/FR-privacy-policy	Functional, Strictly Necessary	TripAdvisor is an American website that offers feedback and advice for tourists from hotel visitors worldwide.	TACds, TASession, ServerPool, TAUnique, __vt, TADCID

Except for strictly necessary cookies, all cookies will expire once they are no longer deemed necessary by us.

5. CONTENT

All of the elements published by us or our partners, including the Website, emails containing logos, texts, photographs, images, illustrations, etc., are the property of us or our partners. This content is protected by intellectual property law, database copyrights or common law.

Therefore you should not use any of this content without prior express written approval.

The Website 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. We are not responsible for the content of external internet sites and you are advised to read the privacy policy of external sites before disclosing any Personal Data.

6. WEBSITE OPERATION

We make every effort to ensure the availability and proper functioning of the Website. However we cannot guarantee that the Website is free of errors or malfunctions, nor that it will function without interruption or that it is compatible with all hardware. Access to the Website may occasionally be suspended or restricted for corrective or ongoing maintenance.