
Privacy Policy

1. Introduction

Teygon Ltd trading as ChicRetreats™ (“we/our/us”) respect your privacy and are committed to protecting it through our compliance with this privacy policy (“Privacy Policy”). This Privacy Policy (together with our terms and conditions and any other documents referred to in it) describes the type of information that we collect from our customers (“you/your”) through the use of our services (“Services”), or the use of our website www.chicretreats.com (“Website”), how that information may be used or disclosed by us and the safeguards we use to protect it.

Our Privacy Policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the Website and website owners. Furthermore, the way this Website processes, stores and protects user data and information will also be detailed within this policy.

Our Website and Services may contain links to third party websites that are not covered by this Privacy Policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding Your information and how we will treat it. By using or accessing our Website or the Services, You agree to the collection, use and disclosure of information in accordance with this Privacy Policy. This Privacy Policy may change from time to time and your continued use of the Website or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

This Privacy Policy was last updated on 03 May 2018 to add new provisions to the policy applicable regarding GDPR. Please check back regularly to keep informed of updates to this Privacy Policy.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

If you have any comments on this Privacy Policy, please email them to reservations@chicretreats.com

You have the right to make a complaint at any time to the Information Commissioner's Office (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.

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.

2. Who are we?

Here are the details that the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (GDPR) says we have to give you as a 'data controller':

- Our Website address is www.chicretreats.com
- Our company name is Teygon Ltd trading as ChicRetreats™
- Our company number is 11502370
- Our registered address: 495 Green Lanes, London, United Kingdom, N13 4BS
- Our nominated representative is Georgia Panteli and they can be contacted at compliance@chicretreats.com

We respect your right to privacy and will only process personal information you in accordance with the Data Protection Legislation which for the purposes of this policy shall mean: (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998 and other applicable privacy laws.

If you have any questions about how we collect, store and use personal information, or if you have any other privacy-related questions, please contact us at reservations@chicretreats.com

3. The Website

We take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience.

When you use or contact our Website, you do so at your own discretion and provide any such personal details requested at your own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed below. Every effort has been made to ensure a safe and secure form to email submission process but we advise users using such form to email processes that you do so at your own risk.

As the party responsible for data processing we ensure that the processed data:

- is processed in accordance with the applicable privacy regulations; and
- is sufficiently protected to not be exposed to persons who should have no access to it, this both internally and externally by taking technical, contractual and organisational safety measures.

4. What information do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, ages, When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number. We may ask for your date of birth to send you birthday offers or anniversary offers.
- Contact Data includes billing address, invoicing address, email address and telephone numbers.
- Financial Data includes bank account and payment card details. We use a third party payment provider to collect financial data and all credit card information for all transactions that go through Our Website. It follows secure encrypted processes a standard for the e-commerce industry.
- Transaction Data includes details about payments and other details of our Services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- Profile Data includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Website and Services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Interaction Data includes any information that you might provide to any discussion forums on the Website.
- Cookies Data like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our websites. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them and what kind.
- Third Parties and Information we receive from other sources We may receive information about you if you use any of the other websites we operate or through the Services 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 our Website. We are also working closely with third parties (including, for example, business and our hotel partners, sub-contractors, advertising networks, analytics providers, search information providers, software suppliers) and may receive information about you from them.
- Analytics includes third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the

data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We also get information on how you use our Services, such as:

- Tracking information – To enable our Services to be used correctly, we may need to use tracking information.
- We use telephone tracking and recording to ensure the best service is delivered by our reservations team.

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process Your personal data if at least one of the following basis applies:

- a) You have given consent to the processing of your personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which we are subject;
- d) processing is necessary to protect the vital interests of You or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- f) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

If we receive personal information in the course of providing our Services to you from another data subject, we expect you to have complete responsibility for ensuring that the contents of this Privacy Policy are brought to their attention and you have obtained their consent in the process.

In some instances, it may be appropriate for us to combine your information with other information that we may be holding about you, such as combining your name with your geographic location or your browsing or purchasing history.

If you fail to provide personal data

If you choose not to provide the personal information we request, you can still visit most areas of the Website, but you may be unable to access certain options and services that involve interaction. You have the final decision on whether to proceed with any activity that requests personal information.

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 our Hotel Booking Services). In this case, we may have to cancel a reservation you have with us but we will notify you if this is the case at the time.

5. How your data is collected

We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through:

Direct interactions. You may give us your information by filling in forms via our Website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- present site content;
- apply for a hotel booking or use any of our Services;
- create an account on our Website;
- subscribe to our Services or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

In addition to the above, we may use the information in the following ways:

- To personalise your Website experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- Processing your hotel reservations
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- If you have opted-in to receive our e-mail newsletter, we may send you periodic e-mails. If you would no longer like to receive promotional e-mail

from us, please refer to the "How can you opt-out, remove or modify information you have provided to us?" section below. If you have not opted-in to receive e-mail newsletters, you will not receive these e-mails. Visitors who register or participate in other site features such as marketing programs and 'members-only' content will be given a choice whether they would like to be on our e-mail list and receive e-mail communications from us.

- Present site content effectively to you.
- Provide information, and services that you request, or (with your consent) which we think may interest you.
- Carry out our contracts with you.
- Provide the relevant Services to you
- Tell you about charges.

Automated technologies or interactions. As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

Third parties or publicly available sources. We shall contract with third parties to supply our Services to you on our behalf. These include our hotel partners for reservations, payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

To request a list of current third parties who we contract with (as joint controllers or processors) please contact reservations@chicretreats.com.

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.

If you are already our customer, we will only contact you electronically about things similar to those hotel reservations previously provided to you.

If you are a new customer, you will only be contacted if you agree to it.

We may keep a record of those links which are used the most to enable us to provide the most helpful information but we agree to keep such information confidential and you will not be identified from this information.

6. How do We use Your data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at marketing@chicretreats.com and we will delete your data from our systems. However, you acknowledge this will limit our ability to provide the best possible services to you.

As already indicated above, with your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email AND/OR telephone with information, news and offers on our Services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

7. Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we use your personal data, and which of the relevant lawful basis that 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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
Details on our Website, to register new customers, including completing registration forms or to submit an enquiry with us.	(a) Identity (b) Contact	Performance of a contract with you
Information to process hotel bookings including:	(a) Identity	
(a) Manage payments, fees and charges	(b) Contact (c) Financial	(a) Performance of a contract with you
(b) Collect and recover money owed to us	(d) Transaction	(b) Necessary for our legitimate interests (to recover debts due to us)
(c) Process bookings	(e) Marketing and Communications	

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
(d) Undertake hotel reviews		
Information to manage our relationship with our customers, or prospective customers which will include:		
(a) Notifying about changes to our terms	(a) Identity	(a) Performance of a contract with you
(b) Asking to leave a review or take a survey	(b) Contact	(b) Necessary to comply with a legal obligation
(c) Correspondence	(c) Profile	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
(d) For internal administrative purposes	(d) Marketing and Communications	
	(a) Identity	
To enable customers and prospective customers to partake in a prize draw, publish results of prize draw or competition, promotional activity, loyalty membership, competition or complete a survey	(b) Contact	(a) Performance of a contract with You
	(c) Profile	(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
	(d) Usage	
	(e) Marketing and Communications	
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
	(b) Contact	(b) Necessary to comply with a legal obligation
	(c) Technical	
	(d) Cookies	
	(a) Identity	
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(b) Contact	Necessary for our legitimate interests (to study how customers use Our products/services, to develop them, to grow Our business and to inform Our marketing strategy)
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
	(f) Technical	
	(g) Cookies	
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Cookies	Necessary for our legitimate interests (to define types of customers for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Monitoring and preventing unlawful acts	All categories	Necessary for the purposes of the prevention or detection of an unlawful act, and must be carried out without the consent of the data subject so as not to prejudice those purposes, and is necessary for reasons of substantial public interest.

8. Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or made hotel reservations from us or if you provided us with your details when you entered a competition or registered for a promotion or prize draw and, in each case, you have not opted out of receiving that marketing. We reserve the right to publish your name on our site and social media if you are a winner of a competition or prize draw you have entered.

As already indicated you can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at reservations@chicretreats.com

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a hotel reservation which still needs to be fulfilled.

9. How do we store your data and security?

We only keep your data for as long as we need to in order to use it, and/or for as long as we have your permission to keep it. In any event, we will conduct an annual review to ascertain whether we need to keep your data. Your data will be deleted if we no longer need it in accordance with the terms of our Data Retention Policy.

We may transfer your collected data to storage outside the European Economic Area (EEA). It may be processed outside the EEA to fulfil your reservation and to receive our Services and deal with payment. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties we engage with and the use of the EU-approved Model Contractual Arrangements. Your acceptance of this Privacy Policy shall be your consent permitting us to store or transfer data outside the EEA if it is necessary for us to do so.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see the European Commission: EU-US Privacy Shield.

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

Any payments made by will be encrypted and via a third party.

We have implemented security measures such as a firewall to protect any data and maintain a high level of security.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

If we give you a password upon registration on our Website, you must keep it confidential. Please don't share it.

10. How do we protect visitor information?

We implement a variety of security measures to protect and maintain the safety of your personal information including encrypted software. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

11. Do we use "cookies"?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the Website's or service provider's systems to recognize your browser and capture and remember certain information. Detailed information is available in our Cookie Policy.

12. Do we disclose the information we collect to outside parties?

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. The term "outside parties" does not include Guestmaster International Ltd trading as ACOMOS™. It also does not include our website hosting partners, subcontractors and other third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

We contract with third parties to supply services to you on our behalf. These may include payment processing, hotel reservations, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We are also allowed to disclose your information in the following cases:

- If We want to sell our business, or our company, we can disclose it to the potential buyer
- We can disclose it to other businesses in our group
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights

We can exchange information with others to protect against fraud or credit risks.

As part of the Services provided, we operate tracking software and tracking information via a third party provider but we ensure that they have sufficient measures in place to look after the data and information on your behalf and this will only be used as authorised by us. This organisation will not be able to use the information for its own benefit.

Our company is registered in England and Wales, but we also provide our Services to other countries within the European Union, you also agree that we may disclose your personal data to other persons if this is required by law or where a legitimate interest is served.

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

13. Change of purpose

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.

14. Your Rights

When you submit information via our Website, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided above in this Policy.

Under the GDPR, You have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;
- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority.

You also have rights with respect to automated decision-making and profiling as set out in section 15 below.

To enforce any of the foregoing rights or if you have any other questions about our Website or this Privacy Policy, please contact us at reservations@chicretreats.com

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 therefore ask us not to use your data by ticking the relevant boxes on our forms, or by contacting us at any time at reservations@chicretreats.com

Our 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. Please check these policies before you submit any personal data to these websites.

15. Automated Decision-Making and Profiling

In the event that we use personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on you, you have the right to challenge to such decisions under GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from us.

The right described in in this section does not apply in the following circumstances:

- a) the decision is necessary for the entry into, or performance of, a contract between you and us;
- b) the decision is authorised by law; or
- c) You have given your explicit consent.

Where we use your personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling.

16. Web Analytics

We also collect some non-personally identifiable information (ourselves or using third party services) using web analytic tools. We use third-party services that use tracking technologies to capture aggregate usage and volume statistics about interactions on our Website and Services

17. Parental Consent

We take our responsibilities seriously where we collect any personal data relating to children.

Where we collect any personal data in the course of our business and to enable us to provide our Services by collecting such data on a lawful basis, we shall ensure that we have your express consent as the parent of that child, and shall only collect the following data from you directly: Children's age.

Where this data is required for the a purpose of bookings, we will take all reasonable steps to ensure that the data will be handled safely, securely, and in accordance with the child's rights, our obligations, and the obligations of the third party under GDPR and the law.

18. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on our Website and you will be deemed to have accepted the terms of this Privacy Policy on your first use of the Website following the alterations. We recommend that you check this page regularly to keep up-to-date.

19. Questions and feedback

We welcome Your questions, comments, and concerns about privacy. Please send us any and all feedback pertaining to privacy, or any other issue.

20. Online Policy Only

This online privacy policy applies only to information collected through our Website and not to information collected offline.

21. Terms and Conditions

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our Website.

22. Your consent

By using our Website and by way of acknowledgment, you consent to our Privacy Policy.

23. Dispute Resolution

The Parties will use their best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

If any such dispute cannot be settled amicably through ordinary negotiations between the parties, or either or both is or are unwilling to engage in this process, either party may propose to the other in writing that structured negotiations be entered into with the assistance of a fully accredited mediator before resorting to litigation.