## Privacy and cookies policy

At our website <u>nh1.co.uk</u>, we are committed to only collecting, using and disclosing your personal data in ways that you expect, or have consented to or as we are required or permitted to by law. This policy explains how we use your information and applies to all *our* customers and visitors to our apps and our websites. NH1 is the trade mark of Triglav Cottage Limited, who is the controller of your data.

## What kind of data we collect?

When you register for any of our services, you may provide us with Your personal details, including your address, email address, phone number and date of birth moreover Your account login details, such as your username and the password you chose. When you browse our websites or use our mobile apps, we may collect Your travel preferences, information about your browsing behaviour on our websites and mobile apps, information about when you click on one of our adverts, including those shown on other organisations' websites, information about the way you access our digital services, including operating system, IP address, online identifiers and browser details, social preferences, interests and activities. When you buy our products in our shops or online, we may collect passenger information, passport details, other ID document details, insurance details, relevant medical data and any special, dietary, religious or disability requests, information about your purchases, including what you bought, when and where you bought it, how you paid for it and credit or other payment information, information about your browsing behaviour on our websites and mobile apps, information about when you click on one of our adverts, including those shown on other organisations' websites, information about the way you access our digital services, including operating system, IP address, online identifiers and browser details, social preferences, interests and activities. When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our services, we may collect: personal data you provide when you connect with us, including by email, post and phone or through social media, such as your name, username and contact details, details of emails and other digital communications we send to you that you open, including any links in them that you click on, Your feedback and contributions to customer surveys and questionnaires. Other sources of personal data - we may use personal data from other sources, such as specialist companies that supply information, retail partners and public registers, Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency, If you log-in using your social network credentials to connect to our platforms and online services e.g. Facebook, Google+ and Twitter, you will agree to share your user details with us. For example, your name, email address, date of birth, location and any other information you choose to share with us. We may use CCTV images. IP address and browser details collected in or in the immediate vicinity of our shops, premises, other buildings and cruise ships. Personal data you provide about other individuals - we use personal data about other individuals provided by you, such as those people on your booking. By providing other people's personal data, you must be sure that they agree to this and you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us.

## What do we use your personal data for?

To provide the products and services you request - we need to process your personal data so that we can manage your account or booking, provide you with the products and services you want to buy and help you with any orders and refunds you may ask for. To manage and improve our products, services and operations - We use personal data to manage and improve our products, websites, mobile apps, customer loyalty or recognition programme(s) and other services. We monitor how our services are used to help protect your personal data, detect and prevent fraud, other crimes and the misuse of services. This helps us to make sure that you can safely use our services. We may use personal data to respond to and to manage security

operations, accidents or other similar incidents, including medical and insurance purposes. We use personal data to carry out market research and internal research and development, and to develop and improve our product range, services, shops, IT systems, security, know-how and the way we communicate with you. We use CCTV images to help maintain the safety of anyone working in or visiting our shops, premises and other buildings, and for the prevention, detection and prosecution of criminal offences. We may also rely on the images to establish, exercise or defend our legal rights. To personalise your experience - We want to ensure that marketing communications relating to our products and services, and those of our suppliers, retail partners, including online advertising, are relevant to your interests. To do this, we may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you. Looking at your browsing behaviour and purchases helps us to better understand you as a customer and it allows us to provide you with personalised offers and services. We may also measure your responses to marketing communications relating to products and services we offer, which enables us to offer you products and services that better meet your needs as a customer. If you do not want to receive a personalised service from us, you can change your preference online, over the phone or by writing (e.g. email) to us at any time. We will update our records as soon as we can. To make contact and interact with you - We want to serve you better as a customer so if you contact us, for example by email, post, and phone or via social media, we may use personal data to provide clarification or assistance to you. We need to process your personal data so that we can manage any promotions and competitions you choose to enter, including those we run with our suppliers and retail partners. For example, if you win a prize. We may invite you to take part in customer surveys, questionnaires and other market research activities carried out by the Triglav Cottage Limited and by other organisations on our behalf.

To help us to better understand you as a customer, and to be able to provide you with services and marketing communications (including online advertising relevant to your interests), we may combine the personal data we collect when you make purchases in-shop with personal data collected from our websites, mobile apps and other sources. We do not sell your personal data to third parties.

Marketing communications - From time to time we may send you relevant offers and news about our products and services in a number of ways, including by email. We may also send you information about other companies' products and services that we believe may be of interest to you. We will only do this if you previously agreed to receive these marketing communications. When you book or register with us we will ask if you would like to receive marketing communications. You can change your marketing preferences online, over the phone, using the 'unsubscribe' link in our marketing emails, replying STOP to the short code in our marketing text messages or by writing to us (e.g. email) at any time. Of course, the choice is entirely yours, but if you say you do not want to receive marketing information from us this will prevent you from receiving great offers or promotions that may be of interest to you. You may still receive servicerelated communications from us. For example, confirming bookings you make with us and providing important information about the use of our products or services. Market research - We like to hear your views to help us to improve our products and services, so we may contact you for market research purposes. You always have the choice about whether to take part or continue in our market research. Sharing personal data with suppliers and retail partners - In order to provide products or services requested by you we may share personal data with suppliers of your travel arrangements, including airlines, hotels and transport companies.

We also work with carefully selected suppliers that carry out certain functions on our behalf. For example, companies that help us with IT services, storing and combining data, marketing, advertising campaign, market research, processing payments and delivering products and services.

We may need to share personal data to establish, exercise or defend our legal rights; this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk.

When we share personal data with other organisations we require them to keep it safe, and they must not use your personal data for their own marketing purposes. We only share the minimum personal data that enable our suppliers and retail partners to provide their services to you and us. **Sharing personal data with regulatory authorities** - So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and antiterrorism purposes, or any other purposes which they determine appropriate. Some countries will only permit travel if you provide your advance passenger data (for example <u>Caricom API Data</u> and <u>US Secure Flight Data</u>). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may assist where appropriate. We may share the minimum personal data necessary with other public authorities if the law says we must, or we are legally allowed to do so.

Sharing personal data with credit reference and fraud prevention agencies When you order or buy products or services from us we may share your personal data with credit reference and fraud prevention agencies. That means looking into any records we hold about you and your records with credit reference agencies (CRAs) or fraud prevention agencies (FPAs). When they get a search from us, a 'footprint' goes on your file which other organisations might see. We may also do checks to confirm your identity. That is to help protect you from identity theft and other types of fraud, and to prevent and detect crime or money laundering. Once in a while we might run more checks with CRAs and FPAs to keep your information and your account up to date. If false or inaccurate information is provided and identified as fraud, the details will be passed to FPAs. This information may also be shared with law enforcement agencies. If you tell us you have got a spouse or financial associate, we will link your records together - so you must make sure you have their agreement to disclose information about them. CRAs also link your records together and these links will stay on your and their files - unless you or your partner successfully files for a disassociation with the CRAs to break that link. We may send these agencies details such as your name, address, accounts and bills, including how you manage them. That includes telling them about your account balances, what you pay us and when you miss a payment. If you don't pay your bills on time CRAs will record that. Agencies may tell others doing similar checks, including organisations trying to trace you or recover money you owe them. Each credit reference and fraud prevention agencies will have its own criteria for how to calculate a credit score. For more information on credit reference and fraud prevention agencies e.g. Callcredit, Equifax and Experian, and the way they may use your personal data, please refer to the Credit Reference Agency Information Notice (CRAIN). The CRAIN describes how the main credit reference agencies use and share personal data they receive about you and/or your business that is part of or derived from or used in credit activity.

## How we protect your personal data?

We know how important it is to protect and manage your personal data. We take appropriate security measures to help protect your personal data from accidental loss and from unauthorised access, use, alteration and disclosure. The security of your data also depends on you. For example, where we have given you or where you have chosen a password for access to certain services, you are responsible for keeping this password confidential. The personal 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 organisations operating outside the EEA who work for us or for one of our suppliers. We put in place appropriate protections to make sure your personal data remains adequately protected and that it is treated in line with this Notice. These protections include, but are not limited to, appropriate contract clauses, such as standard contract clauses approved by the European Commission, and appropriate security measures. We will retain your personal data for only as long as it is necessary for the uses set out in this Privacy Policy and/or to meet legal and regulatory requirements. After this period, we will securely erase personal data. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymise this data. Our websites or mobile apps may contain links to websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy carefully before providing any personal data on another organisation's website as we do not accept any responsibility or liability for websites of other organisations. Our websites or mobile apps may contain social media features such as Facebook, Twitter, Google+ and Pinterest that have their own privacy policies. Please make sure you read their terms and conditions and privacy policy carefully before providing any personal data as we do not accept any responsibility or liability for these features.

How to access and update your personal data?

You have a right to ask for a copy of the personal data we hold about you, although you should be able to access online the personal data associated with your account or booking. You can write to us asking for a copy of other personal data we hold about you. Please include any details to help us identify and locate your personal data. Where we can provide data access, we will do so free of charge except where further copies are requested in which case we may charge a reasonable fee based on administrative costs. We want to make sure that the personal data we hold about you is accurate and up to date. If any of the details we hold are incorrect, please let us know. You can also ask for your personal data to be rectified or erased, to object to the processing of your personal data and, where technically feasible, to ask for personal data you provided to be transmitted to another organisation. We will update or erase your data, unless we have to keep it for legitimate business or legal purposes. You can also contact us if you have a complaint about how we collect, store or use your personal data. We aim to resolve complaints but if you are dissatisfied with our response, you may complain to the Information Commissioner's Office. Please submit your request or complaint in writing to our office: By post: Triglav Cottage Limited, Flat 1 Sheridan Court, 736 Whitton Avenue West, Northolt UB54JU By email: triglavcottage@gmail.com Please note that we may ask you to verify your identity before we can act on your request or complaint. We may also ask you for more information to help ensure that you are authorised to make such a request or complaint when you contact us on behalf of someone else.

Cookies are small data files uploaded on your device when you visit a website or mobile app. Cookies allow a website or a mobile app to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies help us to provide important features and functionality on our websites and mobile apps, and we use them to improve your customer experience. We use Session Cookies which will automatically expire at the end of your browser session on our website and mobile apps. These are generally used for security purpose or to facilitate your use of our website or mobile apps. We use session cookies, to analyse the traffic on our website but also to remember your preference or the content of your online shopping basket. We may also use Persistent Cookies which will be store for a longer period depending on the nature of their purpose. Persistent Cookies are used to remember your preferences and choices when you use our website or for targeted advertising and analytical purposes. Essential cookies will be used as soon as you visit our website or mobile apps. We won't request your consent to use essential cookies as these cookies are strictly necessary to provide the services you requested and to enable core functionality of our website and mobile apps. Without these cookies, essential features and core functionalities of our website or mobile apps will be affected. We use essential cookies for the following purposes: security, network management, accessibility, to help webpage to load quickly, to analyse and monitor our site traffic and also for features such as online shopping basket. For example, essential cookies help us to keep track of what you are booking as you move through each stage of the booking process. Non-essential cookies won't be placed your device or collect any of your information unless you give your consent to allow us to do so. For example, we use non-essential cookies to deliver relevant online advertising and to measure the effectiveness of our marketing communications, including online advertising. We use cookies to help us deliver online advertising that we believe is most relevant to you on our website, mobile apps and other organisations' websites. For example, these cookies help us to suggest flights from your nearest airport, holidays in destinations you have shown interest in or products you might like. These cookies may collect data about your online behaviour, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. This means that you may still see some of our adverts on our websites, mobile apps and on other organisations' websites even if you disable personalised advert on our websites or mobile apps. Such adverts are known as "non-personalised adverts" which do not use information based on your past online behaviour, purchase history or the content of your shopping basket. Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert so it does not become too repetitive. We also use cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you. With our permission, cookies are set on our website and mobile apps by other third-party organisations. These cookies to help third-party advertisers deliver online advertising that they believe is most relevant to you on our website, mobile apps and other organisations' websites. This means that you may see adverts from other organisations on our website, mobile apps and on other organisations' websites. These cookies may collect data about your online behaviour on our websites and mobile apps, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. These third-party advertisers may also combine data we collect through cookies in the browser of your devices with other data that we have collected. Cookies can tell third-party advertisers if you have seen a specific advert, and how long it has been since you have seen it. This information allows them to measure the effectiveness of their online advertising campaigns on our website or mobile apps and control the number of times you are shown an advert, so it does not become too repetitive. You can manage non-essential cookies and change your preferences at any time by using our cookie consent solution. A link is provided in the footer across this website to enable the reselection of these preferences. This tool will set a cookie on your device to remember your preferences. You can then adjust the available sliders to 'On' or 'Off', then clicking 'Save and close'. You may need to refresh your page for your settings to take effect. Alternatively, you can use your browser settings to accept or reject new cookies and to delete existing persistent cookies. You can also set your browser to notify you each time new cookies are placed on your computer or other device. If you choose to disable some or all cookies, you may not be able to make full use of our website or mobile apps as it may disable some of our essential cookies. For example, you may not be able to add items to your shopping basket, proceed to checkout, or use any of our products and services that require you to sign in. Where we display personalised adverts on other organisations' websites, the AdChoices icon will usually be displayed. Clicking on this icon will provide you with specific guidance on how to control your online advertising preferences. Google Analytics also collects information anonymously on our websites. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site.

This Policy replaces all previous versions. We may change the Policy at any time so please check it regularly on our website(s) for any updates. If the changes are significant, we will provide a prominent notice on our website(s) including, if we believe it is appropriate, electronic notification of Privacy Policy changes.

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