Privacy Policy Jaymojournyman ltd, T/A Fy Hiraeth

1. INTRODUCTION AND IMPORTANT INFORMATION

Jaymojournyman Ltd T/A Fy Hiraeth ("we", "us" or "our") are committed to protecting and respecting your personal data and privacy.

This privacy policy relates to how we use and collect personal data from you when you book with us as a guest or visitor to our self-catering accommodation (**the Property**), use our services or access our website. It also relates to our use of any personal information you provide to us by telephone (including SMS or WhatsApp), in written correspondence (including letter and email), through our social media channels and in person.

Please note that:

- our website is not intended for children under the age of 18 and we do not knowingly process personal data relating to children and
- our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Whenever you provide personal data, we are legally obliged to use your information in line with all applicable laws concerning the protection of such information; including but not limited to the Data Protection Act 2018 and the General Data Protection Regulation, as it applies to the UK (**UK GDPR**), described in this policy as the "**Data Protection Laws**".

This privacy policy also forms part of our terms of business and is not intended to override them. This policy may be amended or updated from time to time and any revisions will be posted to this page, so please check back regularly.

2. WHO WE ARE AND HOW TO CONTACT US

2.1 For the purpose of the Data Protection Laws, the data controller is Mark James. We are a private limited company registered in England and Wales under company number 14845897. Our registered office is at 82 Beach Road, Porthcawl CF365NE. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

Email: stay@fyhiraeth.co.uk

Telephone: **+44 7356059502** and ask to speak to the Privacy Officer.

2.2 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.

3. THE DATA WE COLLECT ABOUT YOU

3.1 We collect and process personal data. Typically, the personal data we collect and process will include identity, contract, transactional, technical, profile, usage and marketing and communications data such as:

3.1.1 **Identity Data** includes first name, last name, title or other identifier (such as job title), marital status, date of birth, gender and images.

3.1.2 **Contact Data** includes billing address, email addresses and telephone numbers.

3.1.3 **Transaction Data** includes details about services you have purchased from us or your visits to our premises.

3.1.4 **Financial Data** includes bank account and payment card details.

3.1.5 **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.

3.1.6 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences (including details about your personal likes and dislikes as identified during your visits to our premises), feedback and survey responses.

3.1.7 **Usage Data** includes information about how you use our property (including but not limited to any property facilities such as vehicle registrations for approved vehicles on site, website, products and services.

3.1.8 **Marketing and Communications** data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Please note that we may collect and/or process other personal data from time to time. If we ask you to provide any other personal information not described above, the personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point that you are asked to provide your personal information.

3.2 We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data, but is not considered to be personal data in law as it will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate a percentage of users accessing a specific feature of our services. However, if we combine or connect your 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 solely in accordance with this policy.

3.3 We do not routinely 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). However, we will collect the health information we need to provide special assistance services requested under the booking or where

we need to record and report an incident or accident occurring at the Property. Nor do we collect any information about criminal convictions and offences.

3.4 We only collect data from you directly or via third parties (see the section *Third Parties* below).

3.5 It is important that the Personal Data we hold about you is accurate and current. We cannot be held responsible for any inaccurate or incomplete data on our system arising out of your default in this regard. Please keep us informed if your Personal Data changes during your relationship with us.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

4.1 We use different methods to collect data from and about you including through:

4.1.1 **Direct interactions.** You may give us your Identity, Contact, Profile and Financial Data by filling in forms or by corresponding with us by post, phone, messaging service, email or otherwise. This includes personal data you provide when you:

(a) book our Property;

(b) create an account on our website;

(c) subscribe to our additional service(s);

(d) request marketing to be sent to you;

(e) enter a promotion or survey; or

(f) give us feedback or contact us.

4.1.2 **Automated technologies or interactions.** We may also collect your Technical Data about your equipment, browsing actions and patterns when you visit our website. We collect this personal data by using cookies and other similar technologies.

4.1.3 **Visiting the Property.** We may collect your Usage Data through our inspection of the Property.

4.1.4 **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

(a) Technical Data from the following parties:

- analytics providers;
- advertising networks; and
- search information providers.

(b) Contact, Financial and Transaction Data from providers of technical, or payment services.

(c) Identity and Contact Data from data brokers or aggregators, including trade organisations or exhibition organisers.

(d) Identity and Contact Data from publicly available sources such as Companies House.

5. IF YOU FAIL 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 our services). In this case, we may have to cancel all or part of a service you have with us but we will notify you if this is the case at the time.

6. HOW YOUR DATA WILL BE USED

6.1 We use information held about you to:

6.1.1 carry out our obligations arising from any contracts entered into between you and us and provide our services, including any third party services we make available to you;

6.1.2 carry out feedback and research on our services; and

6.1.3 notify you about changes to our services.

6.2 We never sell your data to third parties or allow third parties to contact you without your permission.

6.3 We share your data with third parties where there is a legal obligation for us to do so or we have identified a valid lawful basis as set out in the table below (please also see clause 7 below). We may process your personal data without your knowledge or consent where this is required or permitted by law.

6.4 We have set out below in a table format, a description of all the ways we plan to use your personal data, and 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. 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**
To register you as a guest or visitor of the Property (including any vehicles).	Identity Contact Usage	Performance of a contract with you. Necessary for our legitimate interests (to ensure unauthorised visitors do not attend or occupy the Property).
To provide our self-catering accommodation and connected service(s) (including but not limited to activities) to you and	Identity Contact Transaction Usage Marketing and Communications	Performance of a contract with you. Necessary for our legitimate interests (to recover debts due to us).

to process related transactions, including: Manage payments, fees and charges Collect and recover money owed to us.		
To provide you with request special assistance.	Identity Contact Health (Special Category Data limited to what is necessary for the provision of special assistance)	Explicit consent.
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy. Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To record incidents and accidents occurring at the Property.	Identity Contact Usage Health (Special Category Data)	Necessary to comply with a legal obligation (health and safety). Necessary for our legitimate interests (to ensure the Property is fit for use by guests and resolve complaints). We may also use this information to exercise and defend our legal rights and may be required by law to process this information.
To enable you to partake in a competition or complete a survey.	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity Contact Technical	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). Necessary to comply with a legal obligation.
To measure or understand the effectiveness of the advertising we serve to you.	Identity Contact Profile Usage Marketing and Communications Technical	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).
To use data analytics to improve our website, services, marketing, customer relationships and experiences.	Technical Usage Profile	Necessary for our legitimate interests (to define types of customers for our products and 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 services that may be of interest to you.	Identity Contact Technical Usage Profile Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).

7. LAWFUL BASIS FOR PROCESSING

7.1 We only process your data (which may include providing it to a third party) where we have identified a valid lawful basis to do so. These are as follows:

7.1.1 **Contractual obligation** – means processing that is necessary to comply with our obligations arising out of a contract, for example, where you have bought services from us we will use the personal data you provide to fulfil our contractual obligations.

7.1.2 **Legitimate Interest** - means in the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process you personal data for our legitimate interests. Where we use legitimate interests we will record our decision on making this decision. We rely on legitimate interest where processing of the data we hold on you does not, in our opinion, affect your rights or freedoms and is proportionate to our interests e.g. keeping you up to date with our latest services or obtaining your feedback on our service.

7.1.3 **Consent** – We will seek to obtain your consent to process:

(a) your data outside our contractual obligations (see above) unless we have identified a Legitimate Interest (see above); and

(b) any special category data.

7.1.4 **Legal obligation** – We may process your data where we it is necessary for us to do so to comply with the law.

7.2 We may also process your personal data in the following circumstances, which are likely to be rare:

7.2.1 **Vital Interests** – where we need to protect your vital interests or someone else's vital interests (the processing is necessary to save a life); and/or

7.2.2 **Public Task** – processing your personal data is needed in the public interest.

8. THIRD PARTIES AND SHARING INFORMATION

8.1 We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

8.2 Please see below the list which sets out the categories of recipients of personal data.

SERVICE PROVIDERS WHO MAY RECEIVE YOUR PERSONAL DATA	***LOCATION*** *(e.g within the UK, EEA or outside of the UK/EEA)*
Email Provider	
Website Provider	
Banks	
Online payment providers	

8.3 We may disclose your Personal Data to any competent law enforcement body, regulator, government agency, court or other third party where we believe disclosure

is necessary: (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

8.4 We may also be required to share your Personal Data as part of any sale, transfer or merger of our business or assets (or parts thereof). Such disclosure will be subject to the buyer's processing of your Personal Data on terms equal to the protections afforded to you by this policy.

8.5 In addition, third parties may provide us with personal data and they should only do so where the law allows them to. This may vary our position as Data Controller under clause **Error! Reference source not found.**.

9. INFORMATION SECRUITY

9.1 We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

10. MARKETING

10.1 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).

10.2 You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

10.3 We strive to provide you with choices regarding certain personal data uses, namely around marketing and advertising. In particular:

10.3.1 We will always obtain your express opt-in consent before we share your personal data with any third party for marketing purposes; and

10.3.2 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 your or by contacting us at any time.

11. INTERNATIONAL TRANSFERS

11.1 Your data is stored by us and our processors in the UK. However, several of our external third parties are based outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that we only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

11.2 Whenever we transfer your personal data to countries outside of the UK and/or European Economic Area ('EEA'), where we use certain service providers (see clause 8.2), we will rely on an appropriate international data transfer mechanism (such as standard contractual clauses (SCCs), international data transfer agreements (IDTAs) or any future agreed mechanisms) approved by the UK regulatory authority, the Information Commissioner's Office. In addition, we will ensure that we have **received**

assurances that an adequate level of protection of the personal data is achieved (based on a case by case assessment of the circumstances of the transfer), including adequate technical and operational measures in place to protect the personal data.

11.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

12. DATA SECURITY

12.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

12.2 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.

13. DATA RETENTION

13.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

13.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

13.3 By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being clients.

13.4 In some circumstances you can ask us to delete your data (see below for further information).

13.5 We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you. Please see clause 3.2.

14. YOUR RIGHTS

14.1 Under the data protection laws your rights are:

14.1.1 **To be informed** – We must make this privacy policy (sometimes referred to as a privacy notice) available to you and be transparent over how we process your data.

14.1.2 **Access** – You are entitled to know what details we hold about you and why. We strive to be as open as we can be in terms of giving people access to their personal data. You can find out if we hold any of their personal data by

making a formal request under the data protection laws. Such requests should be made using the contact details provided in this policy. If we do not hold information about you we will confirm this in writing at the earliest opportunity. If we do hold your personal data we will respond in writing. Our response will:

(a) confirm that your data is being processed;

(b) verify the lawfulness and the purpose of the processing;

(c) confirm the categories of personal data being processed;

(d) confirm the type of recipient to whom the personal data have been or will be disclosed; and

(e) let you have a copy of the data in format we deem suitable or as reasonably required by you.

14.1.3 **Rectification** – We are obliged to correct or update your details. We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

14.1.4 **Erasure** – This is also known as the right to be forgotten. Under Data Protection Laws you have the right to require us to erase your personal data under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and should be submitted in writing to the contact details provided in this policy.

14.1.5 **Restrict processing** – You have the right to 'block' or suppress the processing by us of your personal data.

14.1.6 **Portability** – You have the right to obtain the personal data that you have provided to us in a commonly used machine-readable format and reuse it with a different provider.

14.1.7 **Object** – You have the right to object to us processing your data in certain circumstances. You have an absolute right to stop your data being used for direct marketing, but in other circumstances we may still be allowed (or required) to process your personal data if we can show you that we have a compelling reason for doing so.

14.1.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.

14.1.9 **Withdraw consent**. Where you have given us consent to process your personal data, you can withdraw that consent at any time either by contacting us using the details set out in this policy, or by following the opt-out links in electronic messages where relevant. We do not penalise individuals who wish to withdraw consent and we act on withdrawals of consent as soon as we can.

14.2 Please note that:

14.2.1 in certain circumstances Data Protection Laws may relieve us of some of our obligations to you under the rights summarised above; and

14.2.2 you may need to provide identification in order to prove who you are if you wish to invoke any of your rights as provided by the data protection laws and as summarised above.

14.3 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

15. APPLICATIONS TO WORK FOR US

If you apply to work for us (directly or indirectly) in any role we may receive data about you from third parties. In addition, we will keep the details of your application and any additional information provided to us by you or others during your application so that we can keep you informed of future opportunities that you may be interested in. If you do not wish for us to keep your details for this reason, please let us know by contacting us using the details provided in this policy.

16. CHANGES TO THE PRIVACY POLICY

We keep our privacy policy under regular review. This version was last updated on

19 September 2026

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