

RE CABINS PRIVACY POLICY

Last updated: 2023

Welcome to Re Cabins' privacy policy.

We are Re Ops Limited (t/a Re Cabins) ("**Re Cabins**", "**we**" or "**us**") a company that provides off-grid, boutique cabin getaways and experiences. Our company registration number is 14793954 and our registered address is at 22 Lockworks House, Blackhorse Mills, London, Waltham Forest, United Kingdom, E17 6FB.

For the purposes of UK laws regarding data protection, the data controller is Re Cabins and we are registered with the UK Information Commissioner's Office (ICO).

This privacy policy applies to individuals (both cabin guests, the "**Guests**", and owners of the land our cabins occupy, the "**Landowners**", or "**you**", "**yours**", "**your**") who visit our website at www.recabins.com (the "**Website**"), engage with us via our Website or social media accounts, and in connection with any Guest or Landowner engagements, contracts or matters. 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.

Re Cabins – Privacy Statement

At Re Cabins, the privacy of visitors to our Website, our Guests and of the Landowners we contract with, is of extreme importance to us. We believe in a responsible and proactive approach when dealing with their personal information.

This policy sets out how and why we collect, store, use and share personal information generally, our dedication to protect it, as well as your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint.

If you have any questions about how we use your personal data, please contact: hello@recabins.com

1. The types of personal data we collect

We may collect and use the following information about you:

- ❖ **Your Identity Data** including your first name, surname and, if applicable, national insurance number, date of birth, and photos of your passport and / or other government-issued ID (as permitted by applicable laws).
- ❖ **Your Contact Data** including your billing address, delivery address, email address, and telephone numbers.
- ❖ **Financial Data** including bank account and payment card details.
- ❖ **Your Transactional Data** including information about our business dealings, transactions and interactions with you.
- ❖ **Your Technical Data** including your IP address when you visit or engage with our Website or social media accounts.
- ❖ **Usage Data** including information about how you use or search our Website and services including any user preferences.

- ❖ **Survey Data** including data from surveys that we may, from time to time, run on the Website for research purposes, if you choose to respond to, or participate in, them.

Specific to Guests, we may collect and use the following information about you:

- ❖ **Additional Guest Data** including the identity data, contact data and additional data of additional guests that the main guest will include in the booking.
- ❖ **Your Preferences Data** including dietary requirements, arrival and departure dates, and interests.
- ❖ **Health Data** including information you share with us about your health and / or accessibility requirements when booking our cabins or experiences.
- ❖ **Geolocation Data** including approximate location determined from your IP address from your device or other information you share with us, depending on your device settings.
- ❖ **Marketing and Communications Data** including your preferences in receiving marketing from us, your communication preferences and your language settings.

Specific to Landowners, we may collect and use the following information about you:

- ❖ **Land Registry Data** to obtain records that prove ownership of land.
- ❖ **Mortgage Data** to obtain consent from any mortgage holder of the land.

We will indicate where any personal information we have requested is mandatory. We will also explain the consequences should you decide not to provide information which we have indicated is mandatory. In some circumstances this may mean we are unable to provide you with a certain service.

2. Lawful basis for processing

We will only process your personal data where we have a lawful basis to do so. The lawful basis will depend on the purposes for which we have collected and use your personal information. In almost every case, the lawful basis will be one of the following:

- ❖ **Our legitimate business interests** Where we have a legitimate interest to use personal data regarding you in relation to the operation of our business. Also, where it is necessary for system administration purposes and for internal operations, including survey purposes.]
- ❖ **Performance of an agreement with you (or in order to take steps prior to entering into an agreement with you):** For example:
 - where you have provided your information in order to receive details in relation to our services from us;
 - where you are a Landowner and you have agreed to let us use your land; or
 - where you are a Guest, you have made a booking and we need to use personal data regarding you to fulfil your booking.
- ❖ **Compliance with the law:** where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.
- ❖ **Consent:** you have given consent for us to process your personal data for a specific purpose.

Please find a table which sets out the lawful basis for each category of personal data we collect below, and the lawful basis for collecting it.

We collect most categories of personal data from you directly or when you use our Website or engage with us via social media. However, we collect some personal data such as Land Registry Data and Mortgage Data from the public domain or from third party sources.

Please be aware that where there are additional guests, we will collect some personal data about them from the main guest and we will collect other personal data about them directly.

P u r p o s e o f processing	Category of personal data	Lawful bases
To respond to queries	Identity data Contact Data	Our legitimate interests to respond to queries
To enter into and fulfil the contracts with Landowners	Identity data Contact Data Financial Data Transactional Data Survey Data Land Registry Data Mortgage Data	Performance of an agreement with you
To enter into and fulfil the bookings with Guests	Identity data Contact Data Financial Data Transactional Data Survey Data Additional Guest Data Preferences Data Health Data Marketing and Communications Data	Performance of an agreement with you Our legitimate interests to fulfil the booking
Use of our Website and social media accounts	Identity Data Contact Data Transactional Data Technical Data Usage Data Survey Data Geolocation Data Marketing and Communications Data	Our legitimate interests for our business operations

To manage, deliver and improve our Website	Technical Data Usage Data Geolocation Data	Our legitimate interests for our business operations
To set and operate cookies and similar technologies on our Website	Technical Data Usage Data Geolocation Data	Consent Our legitimate interests for our business operations
For direct marketing	Identity Data Contact Data Transactional Data Marketing and Communications Data	Our legitimate interests for our business operations
To handle complaints and disputes	All data types	Our legitimate interests for our business operations
To comply with the law and to enforce our legal rights	All data types	To comply with our legal obligations Our legitimate interests for our business operations
To perform our day-to-day business operations including business development	All data types	Our legitimate interests for our business operations

3. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of an agreement we have with you, and you fail to provide that data when requested, we may not be able to perform the agreement 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 a service you have with us, but we will notify you if this is the case at the time.

4. How we share your personal data with third-parties

We may share your personal information with our suppliers (in the case of Guests, this may include the Landowner relevant to a booking), business partners, prospective investors and other service providers. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We may disclose your personal information to other third parties in the following cases:

- in the event that we sell any business or assets, in which case we may disclose your personal information to the prospective buyer of such business or assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request;
- in the case of an emergency, in which case we shall share personal data as is necessary and proportionate; or
- to protect the rights, property or safety of us or our users, or others, and in order to enforce or apply the terms of our contracts with Guests and / or Landowners (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

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-parties 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.

5. Marketing

Where permitted by law, we may send you marketing materials which we believe may be of interest to you.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may receive marketing communications from us if you have requested information from us or engaged with us and you have not opted out of receiving that marketing.

- ❖ **Third-party marketing.** We are committed to protecting and respecting your personal data. We will not sell or rent your personal data to any third parties. We will not share your personal data with third parties for marketing purposes.
- ❖ **Opting out.** You can ask us to stop sending you marketing messages at any time by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

6. Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- ❖ **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of online payment services.
- ❖ **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- ❖ **Functionality cookies.** These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- ❖ **Targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title	Purpose

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly.

We do not share the information collected by the cookies with any third parties.

7. Where we store your personal data

Your information is securely stored in the United Kingdom ("UK") or European Economic Area ("EEA").

The personal data that we collect from you will not be transferred to, and stored within, countries outside the UK and EEA.

Whenever we transfer your information internationally, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this privacy policy. In these cases, we rely on approved data transfer mechanisms (such as the EU "Standard Contractual Clauses" or UK "International Data Transfer Agreement" or "UK Addendum") to ensure your information is subject to adequate safeguards in the recipient country. If you are located in the UK or EEA, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

8. Your Rights

Re Cabins takes your privacy very seriously and wants you to be aware of your rights, as follows:

- you have the right to request (i) confirmation of whether we process your personal data and (ii) access to a copy of the personal data retained;
- you have the right to have inaccurate personal data rectified, or completed if it is incomplete;
- in certain situations, you have the right to have your personal data erased or transmitted directly to another company, where technically feasible;
- where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time without impact to any data processing activities that have taken place before such withdrawal;
- you have the right not to be subject to any decisions based solely on automated processing, including profiling, which has legal or other similarly significant effects on you unless we have your consent, it is authorised by law or it is necessary for the performance of an agreement;
- in certain situations, you have the right to restrict or object to our processing of personal data regarding you; and
- the right to lodge complaints before the UK Information Commissioner's Office and you may do so at <https://ico.org.uk/make-a-complaint/>.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please send us an email at hello@recabins.com if you would like to exercise any of your rights.

9. Data Security

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.

We take steps to ensure that your information is treated securely and in accordance with this policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example, by encryption or by using pseudonym, we cannot guarantee the security of your information transmitted via the internet; any transmission is at your own risk.

We have appropriate technical and organizational measures to ensure a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of you and other individuals. We maintain these technical and organizational measures and will amend them from time to time to improve the overall security of our systems.

In addition, we limit access to your personal data to those employees and other third parties who have a business need to know.

We may, from time to time, include 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 information to these websites.

10. How long we keep your personal data

We retain your information for as long as it is necessary for the purposes for which it was collected and processed. Additionally, we retain data for the purposes of satisfying any legal, regulatory, accounting, finance, tax, reporting and insurance requirements after which we take steps to destroy or de-identify personal data when the information is no longer required for any purpose for which it may be used or disclosed by us and we are no longer required by law or regulation to retain the information. Please note that this will be assessed on a case by case basis.

After our agreement with you expires or terminates, or our relationship with you has otherwise ended, we may also store your information in an aggregated and anonymised format.

13. Complaints

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at hello@recabins.com and we will endeavour to deal with your request as soon as possible.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

14. Changes

We will generally notify you of any material changes to this policy, through a notice provided via the Website or otherwise supplied to you. However, you should look at this policy regularly to check for any changes. We will also update the "Last Updated" date at the top of this policy, which reflects the effective date of such policy. Your continued engagement with us after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop your engagement with us.