



Website Data Protection and privacy policy

Cohort Hostel is committed to protecting your personal data and respecting your privacy. We commit ourselves to keeping our guests personal and financial information securely stored online, and use all information provided only when necessary. This policy statement sets out how Cohort Hostel will use and store personal data collected and we ask that you read this policy carefully, as it contains important information on:

- personal information we collect about you;
- what we do with your personal information;
- who your personal information might be shared with;
- Your legal rights

We are the controller of the personal information that we collect from you, which means that we are legally responsible for how we collect, hold and use your personal information.

Your attention is particularly drawn to section 3 of this policy, which confirms that you consent to your personal information and sensitive personal information being held and used by us as described in section 2 of this policy.

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1. Who we are and important information

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you book a stay with us.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller

Cohort Hostel is the controller and responsible for your personal data (collectively referred to as "Cohort Hostel", "we", "us" or "our" in this privacy notice). Our contact details are:

Cohort
The Stennack
St Ives
Cornwall
TR26 1FF

E: office@stayatcohort.co.uk
t. 01736 791664
W: www.stayatcohort.co.uk

For all data matters contact Daniel Strickland on 01736 791664 / office@stayatcohort.co.uk

Third-party links outside of our control

This 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 notice of every website you visit.

2. What personal information do we collect about you and why?

Our website is a place for you to find out more about us, the services that we offer and how you can book your stay with us.

When you visit our website, we collect personal information about you (including your full name, home address, telephone number and e-mail address any other personal information that you provide when you contact us by telephone, e-mail or website enquiry form) when you:

- make a booking via our website (in which case, you will be re-directed to the website of our service provider - Cloud Beds - to complete the booking);
- provide us with feedback about our services and your stay with us; and
- submit an enquiry to us.
- Upon check in take identification details from you

We use such personal information to:

- process your booking and collect payments via our service providers
- provide you with the services that you have requested from us
- communicate with you, including in response to any of your enquiries
- improve our services and respond to changing needs
- comply with accounting, taxation and record keeping requirements
- consider your feedback and handle and resolve complaints made by you
- keep the personal information that we hold about you accurate and up-to-date (if you provide any new personal information to us via the website), and
- notify you of any changes to our website or to our services that may affect you.

We may not be able to provide the above services to you if you do not provide us with sufficient personal information to allow us to do so.

We may use your address, e-mail address, telephone number and mobile telephone number to send you offers and promotions about our services that might be of interest to you. By providing us with these contact details, you consent to receiving such information from us by these means. You can, of course, opt out at any time by contacting office@stayatcohort.co.uk

If you fail to provide personal data

Where we need to collect your personal data by law (such as Immigration (Hotel Records) Order 1972), 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 accommodation or card payment details). 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.

Promotional offers from us

We may use personal 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.

You may receive marketing communications from us if you have requested information from us or made a booking with us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

It is highly unlikely that we will ever share your personal data with third-party marketing companies.

However, in the event we do we will get your express opt-in consent before we share your personal data with any company outside the Cohort for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant box to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by email us at office@stayatcohort.co.uk 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 you initiating and completing a booking with.

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 Lee Strickland or Daniel Strickland at office@stayatcohort.co.uk

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.

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.

Cookies

We may also collect information about you via cookie files. A cookie is a small text file that is placed on to your computer or other access device when you visit our website. We use cookie files to:

- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content and services and to help us better understand our visitor requirements and interests; and
- make your online experience more efficient and enjoyable.

The information we obtain from our use of cookies will not usually contain your personal information. Although we may obtain information about your computer or other access device, such as your IP address, your browser and / or other internet log information, this will not usually identify you personally.

The table below provides more information about the cookies we use and why:

Name of cookie	Owner	Purpose of the cookie
Google Analytics	Google Inc.	This is a web analytics service provided by Google Inc., which uses cookies to show us how you found and explored our website, and how we can enhance your experience. It provides us with information about how you used our website e.g. how long you stayed on the website, the average number of pages viewed and also tells us how many visitors we have had.

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. For more information about the cookies we use, please see our Cookie policy.

3. What is our legal basis for holding and using your personal information?

Data protection laws require us to have a legal reason for collecting, holding and using your personal information.

In some circumstances, we may rely on your consent as the legal reason. By providing us with your personal information and the personal information of other individuals within your booking group via our website, you:

- consent to it being used by us as described in section 2 of this policy; and
- confirm that you have informed the other individuals of 12 years old and above of the content of this policy and they have provided their consent to their personal information being used by us as described in section 1 of this policy.

You and the other individuals have the right to withdraw your consent to us holding and using your and their personal information by contacting us. Once you / they have withdrawn your / their consent, we will no longer use your / their personal information and sensitive personal information for the purpose(s) set out in section 2 of this policy, which you originally agreed to, unless we have another legal reason for doing so.

Our other legal reasons for holding and using your personal information are:

- performance and management of the booking entered into between us;
- legal and regulatory obligations which apply to us;
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, including sharing it with our contractors and service providers (listed in section 4 of this statement), for the purposes described in section 1 of this statement.

4. Who do we share your personal information with?

We may share your personal information with the following organisations for the purposes described in section 2 of this policy:

- our service providers to process your booking (Cloudbeds Ltd), maintain the systems on which your personal information is stored and process your booking payments;
- our solicitors and consultants for providing legal advice;
- our auditors and accountants; and
- third parties who undertake mailings on our behalf.

5. How long do we keep your personal information?

We will only keep your personal information for as long as we need to for the purposes described in section 2 of this policy, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained in our Data retention policy, which is available on our website or by contacting office@stayatcohort.co.uk

6. How do we keep your personal information secure?

The security of your personal information is of importance to us and we use technical and organisational measures to safeguard your personal information.

However, while we will use reasonable efforts to safeguard your personal information, the use of the Internet is not entirely secure and, for this reason, we cannot guarantee the security of any personal information that is transferred by or to you via the Internet

For this reason we request that all sensitive information is transferred to us using PCIDSS compliant software such as our booking system (Cloudbeds) and online merchant bank (Stripe). Information of a sensitive nature should never be sent by email or any other online platform, and we accept no responsibility for the security of data sent this way.

7. If you provide information to us about someone else

We understand that there may be situations where you provide us with personal information about somebody else. In those situations, you confirm that:

- the other individual has consented to you acting for them and to your use of their personal information;
- you have informed the other individual of our identity and the contents of this policy, including the purposes for which we will use that individual's personal information described in section 2 of this policy; and
- the other individual has explicitly consented to our use of that individual's personal information for the purposes described in section 2 of this policy.

This policy will apply to our collection, handling and use of the other individual's personal information in the same manner that it applies to your own personal information.

8. International transfers

Some external third parties may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by implementing safeguards:

- Ensuring parties have a Privacy policy mirroring protections afforded within the EEA

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. 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.

10. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which you can request from us by contacting office@stayatcohort.co.uk

In some circumstances you can ask us to delete your data. See Your Legal Rights below for further information.

In some circumstances 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.

11. Your legal rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research).

If you wish to exercise any of the rights set out above, please contact office@stayatcohort.co.uk for subject access rights.

No fee required – with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

Time limit to respond

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

12. Updates and your duty to inform us of changes

This version was last updated on 29th April 2021 and any historical versions can be obtained by contacting us.

We may update this policy at any time, and you should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access our website.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

13. Queries, requests or concerns

We welcome your feedback on how we hold and use your personal information.

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact us on office@stayatcohort.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.