



Privacy Notice

Summary

Citystay Limited ('We') have always, and will continue to, be committed to maintaining our award-winning quality of service.

Citystay Limited are committed to the protection and respect of the Personal Data we hold on you.

Our use of your personal information is governed by this Privacy Notice and any other documents referred to in it.

What This Policy Does?

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Citystay Ltd is a Controller for the personal information that it collects and uses about you and a Processor for some data referred to us by any Third Party who you would have allowed or enabled to use your data for a lawful purpose relating to our services.

We will always treat your personal information as confidential and your personal information will only be shared with others in accordance with this Privacy Notice.

When you visit our website, www.citystayuk.com, you are accepting and consenting to the practices described in this policy.

This Privacy Notice explains;

- What personal information is
- Your rights in relation to your personal information
- How we collect your personal information
- The types of personal information we collect
- How we use your personal information
- The legal basis for processing your personal information
- How we share your personal information
- How long we keep your personal information
- How we keep your personal information secure
- Overseas transfers of your personal information
- How to make complaints and how to contact us

If we need to change the way in which your personal information is used by us, Citystay Limited will update this Privacy Notice, although if the changes are deemed to be significant, we will alert you.

What Is Personal Information?

Personal information is any information that, on its own identifies you, or can be put together with any other either information, can identify you or tell us something about you. This could include information such as name, email address, other contact details, date of birth, bank account details or any information about your needs or circumstances.

Some personal information is classified as "special" data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive, and we need to have further justifications for collecting, storing and using this type of personal information.

Any references to personal information in this privacy notice will include personal data, and where relevant, special categories of personal data.

Much of the personal information we process is information that you or someone acting on your behalf knowingly provides to us.

This Policy also applies to the personal information about you that we receive from a third party, unless specifically covered by such third party's privacy policy.

On this site, "Citystay", "our" and "we" each mean any permanent Citystay Limited Office or temporary location being used as such, in the United Kingdom, which collects and use your information in the manner set out in this Privacy Notice.

When Do We Collect Personal Information From You?

We may collect and process all or some the following data about you when you contact us, enquire with us, stay with us, or interact with us:

The Information You Give Us:

You may give us information about you by making a booking or filling in forms on our site www.citystayuk.com ("our site") or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you search for a serviced apartment, book a serviced apartment on our site and when you report a problem with our site. The information you give us at this point is likely to include your name, address, e-mail address and phone number, financial and credit card information, special requirements such as those relating to any disability or medical condition which may affect the chosen arrangements and dietary restrictions (which may disclose your religious beliefs).

When you make a booking via our partner property management system – ResHarmonics who then process this Data on our behalf you can be assured that this is via a secure <https://> connection and any details provided are stored securely in the booking system. During this process, as a guest, you would create an account which you can login to and see details of reservations, as well as your data which is held there. This can be edited by you, giving you control.

The Type Of Personal Information We May Collect:

The types of personal information that we may collect, receive and process, includes:

- Your Name
- Gender
- Personal & Work Contact Details
- Business Title
- Date of Birth
- Image
- Nationality
- Passport
- Visa Information
- Guest stay information

- Dates of arrival and departure
- Goods and services utilised
- Special requests made
- Observations about your service preferences
- Your credit or debit card details, and your bank account details;
- Information feedback or content you transparently provide regarding your marketing preferences, in surveys, competitions, or promotional offers, or to our websites and those of third parties
- Information collected whilst using a facility provided by Citystay Limited
- using closed circuit television systems,
- Internet systems (including wireless networks that collect data about your computer, smart or mobile device, or your location),
- Contact with certain vendors and other individuals with whom we do business (e.g. travel agents or meeting and event planners).

The Information We Collect About You

With regard to each of your visits to our website we may automatically collect the following information:

- Technical information
- Including the Internet protocol (IP) address used to connect your computer to the Internet
- Your login information
- Browser type and version
- Time zone setting
- Browser plug-in types and versions
- Operating system and platform
- information about your visit, including the full Uniform Resource Locators (URL)
- clickstream to, through and from our site (including date and time)
- products you viewed or searched for
- page response times
- download errors
- length of visits to certain pages
- page interaction information (such as scrolling, clicks, and mouse-overs)
- methods used to browse away from the page and any phone number used to call our customer service number.

The Information We Receive From Other Sources

We may receive information about you if you use a website that we either operate or which directly processes Data on our behalf, via the other services we provide. We work closely with many third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and therefore we may receive information about you from them.

We will only request as much Data from you that we require at certain stages in our business processes. This is good practice in GDPR terms.

Why Do We Collect This Information?

To provide you with products and services. Each product and service have different information requirements. Therefore, the personal data we need, and what it is needed for, can differ.

To provide you with information about products and services that we, believe will be of interest to you. We will only do this with your consent. You can withdraw your consent at any time by changing your marketing preferences or unsubscribing using the link at the bottom of the emails we send you (this will be an "unsubscribe" link) or by sending an email to info@citystayuk.com.

How We Use This Information

We use information held about you in the following ways:

The Information You Give To Us:

We will use this information:

- we may use your name, address and credit/debit card details to process your serviced apartment booking even if this has been booked through an agent;
- we will use your details to provide you with the information, products and services that you request from us, to manage your booking, send you notifications and communicate with you generally.
- to provide you with information about other serviced apartments and/or services we offer that are like those that you have already purchased or enquired about;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

The Information We Collect About You:

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in any interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

In addition, if we are providing a service to you, or on your behalf, where we are required to do so by law, we may request a copy of your passport.

Security

Because the security of your personal information is important to us, Secured Socket Layer ("SSL") software is used on our booking platform 'ResHarmonics' to encrypt the personal information that you provide to us. If your browser is SSL enabled (which most are), your transmission of personal information to this platform online will be encrypted. You can verify whether your personal information is transmitted using SSL encryption by confirming the symbol of a closed lock or solid key on the bottom bar of your browser window.

Different browsers may use different symbols. You can also verify that your personal information will be encrypted using SSL encryption by making sure that the prefix for the web address listed for that page has changed from "http" to "https". If you do not see the appropriate symbol and the "https" prefix, you should not assume that the personal information that you are being asked to provide will be encrypted prior to transmission.

The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents fully permitted by law.

Where it has come to our attention and is required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions for the due protection of your rights.

Legal Basis for Processing

What is the legal basis of our data processing?

Under data protection legislation we are only permitted to use your personal information if we have a legal basis for doing so. We rely on the following legal bases to use your information;

Where we need information to perform the contract we have with you or to provide a service for you;

Where we are complying with a legal obligation;

Where processing is required to carry out activities which are in Citystay's legitimate interests (or those of a third party) to do so and provided that your interests and fundamental rights do not override those interests, including:

Processing that is needed for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns. This could include sending marketing information from time to time after you have engaged us to provide services or received services from us which may be similar and of interest to you or where you have expressly indicated that you would like to receive such information. You will always have a transparent right to opt out of receiving this information at any time.

Processing that is necessary to improve our knowledge of the real estate sector – this may include undertaking market analysis and research so that we better understand trends in our business sector and provide better knowledge along with more tailored and relevant services for our customers in the future.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively – this may include: verifying the accuracy of information that we hold about you and create a better understanding of you as a customer; processing for administrative efficiency purposes such as where we outsource certain administrative functions to third parties who are specialise in such services; processing for network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access or to comply with a request from you in connection with the exercise of any of your rights outlined below.

In more limited circumstances we may also rely on the following legal bases:

- Where we need to protect your interests (or someone else's interests); and/or
- Where it is needed in the public interest or for official purposes
- We may process special categories of personal information and criminal conviction information in the following limited circumstances:

o With your explicit consent, in which case we will explain the purpose for which the information will be used at the point where we ask for your consent.

Disclosure of Information

We may share your personal information with any member of our Company;

- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. (We do not disclose information about identifiable individuals to our advertisers).
- analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- if Citystay Limited sells any part of the business to a third party, personal data held by it, about its customers may be one of the transferred assets, provided that the recipient is compliant with the EU GDPR;
- who act as “data processors” on our behalf, or to other organisations that perform business functions on our behalf, some of whom are outside the UK/European Economic Area. These functions include administration, providing services (and contacting you where necessary), customer care, business management and operation, re-organisation/structuring/sale of our business (or our group companies), risk assessment, security and crime prevention/detection, research and analysis, marketing, monitoring, measuring and assessing customer purchasing preferences and trends, dispute resolution, credit checking and debt collection.

Where We Store Your Personal Data

The data that we collect from you is stored within the European Economic Area (“EEA”). Data is unlikely to be processed by staff operating outside the EEA who work for us, but where this is identified as having to take

place for the fulfilment of your booking, processing of your payment details or the provision of support services, we will always make sure that your data is secure and subject to the same protection as if it was being processed in the European Economic Area.

By submitting your personal data, you agree to allow us to manage this transfer, storing or processing. We will of course take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. However, whilst you can rely on Citystay to ensure that we will do our best to protect your personal data, you should be aware that any transmission of such data is always at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The EU GDPR gives people certain rights about how their Data is collected, stored and used.

Your Rights In Relation To Your Personal Data

You have several rights in relation to your personal information, these include the right to:

- Be informed, via this notice or by contacting us with any queries using the details below, about how we use your personal information;
- Obtain access to your personal information that we hold;
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- Request that we erase your personal information in the following circumstances:
 - If Citystay is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - If Citystay is relying on consent as the legal basis for processing and you withdraw consent;
 - If Citystay is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 - If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
 - If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate;
 - our processing of your personal information is unlawful;

- where we no longer need the personal information, but you require us to keep it to enable you to establish, exercise or defend a legal claim;
- where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need to perform our agreement with you and personal information where we are relying on consent to process your personal information;
- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects, or which could have a similarly significant effect on you.

Where relevant, we may ask you to indicate how you would like to receive any offers, marketing and promotional information (e.g. via email or regular mail) and whether you would be willing to participate in surveys. Once you have indicated your preferences, you can always change them.

In certain circumstances, your consent may be implied by you (e.g. where communications are required to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be Sensitive Personal).

Accessing & Updating Your Personal Information

With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in the "contact" section. Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information we may require making that determination.

We will aim to provide this free of charge, in a machine-readable format, within 30 days from your application.

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

Who Sees Your Personal Data?

The personal data we collect about you will be used within Citystay Limited. Exactly who sees your personal data depends on the context in which you provided it.

Sometimes we'll share your personal data with third parties outside our facilities. We may do this for the following reasons:

- If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.
- To comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority.

We will only deal with third parties that we trust to treat our customers' personal data with the same stringent controls that we apply ourselves and we will always be transparent about who may receive this.

How Long Do We Keep Your Personal Data?

How long we keep your personal data depends on the context in which you provided it and the marketing preferences you have expressed. In particular:

- We will keep any personal data we or need to provide you with any of the services we provide to you for the period during which that service is provided;
- We may keep your contact details for as long as we have your consent to send you marketing information;
- We may keep records of any transactions you enter with us for up to seven years plus the year when that transaction was made. This is so that we can respond to any complaints or disputes that arise in that period;
- We will keep other personal data about you if it is necessary for us to do so to comply with the law.
- We've implemented technology and security policies, rules and measures to protect the personal data we have under our control, both on and offline, from improper access, use, alteration, destruction and loss.

We will take all reasonable steps to protect your personal information, but data can never be guaranteed as 100% secure. Please note that we will not be liable for any breach of security unless we have been negligent.

Cookies

Information about our use of 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 allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

What are Cookies?

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number.

Two types of cookies are used on this web site – session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site, and persistent cookies, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Cookies allow us to obtain information regarding users of our site which essentially helps us to provide you with a better user experience and tailor our services to your individual needs. We may collect information such as your IP address, online activity, web browser details and online activity. We will not however collect or store any of your passwords or other highly sensitive data.

By using our website with your browser settings adjusted to accept all cookies, we will take this to mean that you want to use our products and services, and that you consent to our use of cookies and other technologies as described in this Policy.

The Cookies that we use

We use the following cookies:

Strictly necessary cookies. These cookies are essential to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

Analytical/performance cookies. They 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 (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Objecting to Cookies

Most browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. You may elect to reject cookies by adjusting your browser's settings. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Lifetime of Cookies

Except for essential cookies, all cookies will expire after two hours.

External Links

Please note that our site contains certain literature and hyperlinks to websites owned by third parties. This privacy policy covers websites owned and controlled by us only. Links to other websites and any information collected by these sites are not covered by this privacy statement.

Monitoring

To ensure that we carry out your instructions accurately, to help improve our service and in the interest of security, we may monitor and/or record: (1) your telephone calls; and (2) customer transactions and activities on our website. All recordings are and shall remain our sole property.

Changing Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contacting Citystay

You can withdraw your consent at any time by changing your marketing preferences or unsubscribing using the link at the bottom of the emails we send you (this will be an "unsubscribe" link) or by sending an email to info@citystayuk.com

If you would like to exercise any of your rights, please contact info@citystayuk.com or write to us at:

- The Data Controller, Citystay Limited, 2 Nuffield Close, Cambridge, CB4 1SS.