

# **THE EDINBURGH ADDRESS LIMITED**

## **PRIVACY POLICY STATEMENT**

This Statement explains when and why we collect personal information from you (referred to as personal data) and how we use it, the conditions under which we may disclose it to others, our lawful bases for processing your personal data and how we keep it secure. We reserve the right to change and update our privacy policy.

Any questions regarding this privacy policy statement and our privacy practice should be sent by email to [privacy@theedinburghaddress.com](mailto:privacy@theedinburghaddress.com) or in writing to 3 Coates Place, Edinburgh, EH3 7AA. Alternatively you can telephone 0131 261 8646 and ask to speak to Anna Morris.

### **Who are we?**

The Edinburgh Address Limited is a company registered in Scotland under the Companies Acts registered number SC340134 and having its registered office at 3 Coates Place, Edinburgh EH3 7AA. Under the Data protection laws we are data controllers and as such are obliged to confirm to you our responsibilities when processing your personal data.

### **How do we collect personal data from you?**

We refer to our Booking Terms and Conditions and our Property Owner Contract which refers to Property Owners, Accommodation Providers and Guests. In this Statement we use this expression Owner to mean Property Owner/Accommodation Provider.

In each instance your personal data has been given to us directly by you. You may also have opted in to our mailing list. You may also provide personal data to us when you use our website. Our privacy policy in respect of website use can be found on our website at [www.theedinburghaddress.com](http://www.theedinburghaddress.com).

### **What type of personal data is collected ?**

The personal data may include your name, any other names you have used, gender, address, email address, information to verify your identity such as passport details and a statement confirming current address, date of birth, and financial information such as bank account details.

### **How is your personal data used and processed?**

We may process your personal data:-

- to complete contract paperwork such as an Accommodation Provider contract and booking forms (and these documents may be shared with other professionals such as our lawyers and accountants) and to contact you;
- to maintain databases in our computer system;
- to process identification and verification paperwork;

- to maintain paper filing systems in our office;
- to transfer funds to you;
- to share some of your personal data with the Owner, Guest or a property manager, and in respect of the Owner some personal data may be shared with third parties for photography of your property and also when listing a property on a holiday letting site such as VisitScotland, Booking.com and other holiday advertising sites;
- to deal with any complaints received;
- for marketing our services to you;
- for the purposes of external audits and quality checks, and for insurance purposes;
- to exercise our legal rights which may include sharing with courts and other law enforcement agencies.

### **Lawful basis for processing -**

We need to have a lawful basis for processing your personal data. We have more than one lawful basis for processing your personal data and these are:-

- **Necessary for entering into and performance of a contract**

It is necessary for us to process your personal data for the performance of a contract – that contract being a contract of short term residential letting and thereafter to be able to fulfil that contract;

- **Legitimate interests**

Prior to completion of any letting agreement, we have a legitimate interest to carry out proof of identification checks;.

It is necessary for our legitimate interests as a letting business to process your personal data by including you in our customer database;

**If you have opted in to receive our marketing materials** then we shall include you in our marketing newsletters and emails.

## **How your personal data is stored and the length of time we shall retain your personal data?**

Personal data is securely stored electronically and/or as hard copies. Our computer system is hosted on various cloud platforms and we do not have any office based servers. Our cloud hosts include Microsoft Office 365 (hosted in the EU), gmail (hosted in the US), Xero ( an online accounting system hosted in the US), Bookster (an online booking system hosted in the UK ). We also use the cloud file sharing platform Dropbox which is hosted in the United States and locations around the world.

Paper files are stored securely in our office.

Generally, we shall retain contract paperwork for a period of 6 years .

We shall retain your details in our customer database for our marketing newsletters/emails for as long as you stay opted in to receive these.

We delete identification documents two weeks after the end of any letting period to which the documents applied.

We have service agreements in place with all of our third party service providers who process personal data on our behalf.

## **The right to lodge a complaint**

You have the right to complain to the supervisory authority in the part of the European Union where you work, normally live or where any alleged infringement of data protection laws occurred if you believe we have not dealt correctly with your personal data . The supervisory authority in the UK is the Information Commissioner's Office (ICO).. The contact details of the ICO's UK office can be found on their website <https://ico.org.uk/global/contact-us/> and the contact number is **0303 123 1113**. The contact details for the ICO's Scotland office are:

The Information Commissioner's Office - Scotland  
45 Melville Street  
Edinburgh  
EH3 7HL

Telephone: 0303 123 1115

Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

## **Objecting to processing personal data**

One of our lawful basis for processing your personal data is for the purpose of proof of identification. This is on the basis that we have legitimate interests as already outlined above for processing your personal data in this way. You have the right to object to us processing your personal data for these purposes. However, this may mean we cannot perform the services you have requested or you may not be able to use our services.

### **Request for access to your personal data**

You have the right to obtain access to the personal data we hold free of charge (unless the request is manifestly unfounded or excessive or repetitive in which case we reserve the right to charge a reasonable fee for providing the information). If you request access to your personal data we must provide this within one month of such a request unless there is complexity or a number of requests in which case we may seek to extend this period of one month to three months.

### **Right to rectification of personal data**

You have the right to have personal data rectified if it is inaccurate or incomplete.

### **How we keep your personal data secure**

All personal data collected by us is stored on secure cloud hosts and paper or hard copy filing is stored securely in our office. We have contracts in place with all of our third party service providers.

Mobile devices used for work are password protected with strong passwords and quick lockdowns.