



Privacy & Data Protection Policy

At *Bonnes Routes Gite*, we are committed to implementing the General Data Protection Regulation (GDPR), EU Regulation 2016/679, to protect the privacy and data of our customers.

We will:

- Process personal data fairly and lawfully and in a transparent manner.
- Only collect personal data for specified and legitimate purposes, and only process data in a way that is compatible with those purposes.
- Make sure that personal data held and processed is adequate, relevant and only limited to what is necessary.
- Take steps to ensure that personal data is accurate and kept up to date.
- Not keep personal data for longer than is necessary for the intended purposes.
- Process personal data in line with the rights of individuals under the GDPR.
- Take suitable measures against unauthorised or unlawful processing, and against accidental loss or destruction of, or damage to, personal data.
- Not transfer personal data to a country or territory outside the European Economic Area.

Bonnes Routes Gite are a data controller, and also a data processor when receiving bookings through third-party agents.

Third-Party Relationships

In running our business we work with third-party agents who act as a medium for customers to book and pay for accommodation with us. These agents share customers' personal information such as is required to enable us to deliver the service that has been requested. When using agents to book accommodation, customers agree to the privacy and data protection policies of these organisations, so should familiarise themselves with these before booking with *Bonnes Routes Gite*.

We provide links on our website, or sometimes in electronic communication, to third-party organisations. These organisations collect data as a result of people visiting their website. We do not control these third-party websites and are not responsible for their privacy policies. Customers are responsible for reading and agreeing to the policies for any third-party websites they visit.

Data we collect

PERSONAL DATA

Personal data, or personal information, is any information from which a person can be identified. We collect, use, store and may transfer the following personal data:

- name
- date of birth

- address
- email address
- telephone numbers
- date of birth*
- place of birth*
- nationality*

** this personal data will only be collected as required by law on the registration form Fiche Individuelle de Police pursuant the article R. 611-42 of Code of Entry and Stay of Aliens and of the Right of Asylum, for non-French nationals.*

We do not collect or process special categories of data about customers, such as ethnicity, religious opinions or health. As our services are not available to children, we do not collect any personal information from children under 18.

OTHER INFORMATION

We collect, use and process bank account or PayPal account details of customers for the sole purpose of processing refund payments relating to their accommodation booking with us. We do not store or retain this data.

Payments made through third-party agents are governed by the contract between the customer and agent - we do not have access to any payment information resulting from this relationship and are not involved in the processing of such payments.

COOKIES

Our website (www.bonnesroutes.fr) uses cookies (small text files in a web browser) to assist in the effective running of our website, to recognise returning visitors and analyse use of the site. Visitors can opt out of cookies using their browser settings - this does not impact on their ability to navigate and use our site. We also use web analytics services provided by Google Inc. Information from the use of Domains (including your IP address) is routed to Google in the United States. All analytical data collected is non-identifiable without reference to personal information.

CCTV IMAGES

As part of our security measures, *Bonnes Routes Gite* utilises CCTV cameras within our private driveway and garden and guest parking area. Cameras record activity based on motion detection. When customers are resident, there will be no monitoring of the decking/garden area, assuring guests absolute privacy. Cameras covering the guest parking will be active at all times for security purposes. Recordings will be available for guests to review and will be automatically overwritten within 30 days.

How we collect your data

All personal data is collected as a result of a direct customer-instigated engagement or from data published in the public domain e.g. business or car club website, social media. For the latter this will be limited to name, address, email address.

Customers provide their data to us through:

- completion of a booking request or query through a third-party agent as detailed above
- the Contact Form of our website
- completion of a Booking Form
- completion of the *Fiche Individuelle de Police* form as detailed above

How we use your data

We will use your data to deliver the service that you have requested from us; to manage our relationship with you including communicating about your booking via emails and telephone; to inform you about services and activities that may interest you; facilitate our "returning guests discount" offer; and to meet our legal obligations.

The legal bases for collecting, using, storing and transferring your data are as follows:

1. Processing is necessary for the performance of a contract to which the individual is party or in order to take steps at the request of the individual prior to entering into a contract.
2. Processing is necessary for compliance with a legal obligation to which the data controller (*Bonnes Routes Gite*) is subject.
3. Consent of the individual.
4. Legitimate interests in relation to direct marketing via email or post.

In some limited circumstances, we are legally required to share certain personal data if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority e.g. sharing the *Fiche Individuelle de Police* with the police or gendarmerie when requested.

How we store your data

Personal data collected by us will be stored electronically in an encrypted, password-protected IT system which is only available to the data controller and authorised personnel. We will take all reasonable steps to minimise the risk of accidental loss or theft of computer equipment containing personal data. Appropriate virus and security protection will be installed to ensure the integrity of the system as far as possible.

Personal data shared with us by our third-party agents as authorised by the customer, will be accessed through secure password protected systems maintained by the agent, and will be accessible to authorised personnel only.

The *Fiche Individuelle de Police* completed by guests will be scanned and stored electronically as above to ensure data security. Where manual records are held these will be held in a secure, locked cabinet, accessible only to the data controller.

Retention and Disposal

We only keep your personal data for a period of time necessary to realise the reason(s) for which it was first collected, and to enable us to meet our legal and fiscal obligations including:

Purpose	Data Location	Retention Period
To comply with Article R. 611-42 of Code of Entry and Stay of Aliens and of the Right of Asylum	Fiche Individuelle de Police	Six months following the departure of guests
To report our Taxe de Sejour pursuant to Articles L2333-26 and R2333-43 of the code général des collectivités territoriales	Bookings Database	Up to 12 months
To validate discounts for future bookings (our repeat booking discount)	Bookings Database	Three years after your last departure date
To provide you with information about services and activities	Bookings Database	Three years after our last exchange
Direct marketing	Business Listing	Until removal requested

To meet fiscal and legal obligations we may need to keep some of your data for up to ten years after our service contract has concluded. However, this data will be anonymised at the earliest opportunity to ensure only the minimum required information is retained.

Where you have booked accommodation through a third-party agent, they will retain your data in line with their own policy.

Your Rights

Under the GDPR you have the right to:

1. **be informed** about our collection and use of your personal data. This policy should tell you everything you need to know, but contact us if you would like more information.
2. **access the data we hold**. You can request a copy of the personal data we hold about you to check it is correct and that we are processing it legally.
3. **correct** any information we hold about you.
4. **ask us to erase your data** where there is no good reason for us to hold it.
5. **restrict processing** of your data e.g. we can continue to store it but not process it.
6. **data portability**. You can request that we transmit your personal data to you or to a third party in a commonly used and machine readable form e.g. CSV files, enabling other organisations to easily use your data.
7. **object to us processing your personal data** processing based on legitimate interests (including direct marketing and research) or the performance of a task in the public interest/exercise of official authority.

If you wish to exercise any of these rights please email: gdpr@bonnesroutes.fr

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). For security purposes we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. We will respond to all legitimate requests within one month.