

## **Introduction**

This Privacy Policy (as required by EU General Data Protection Regulation (GDPR) of 25 May 2018) explains what we do with your personal data in connection with making a reservation or booking with and during your stay at Ballynoe House, making payments, and using the services of the resident genealogist at Ballynoe House.

This Privacy Policy describes how we collect, use, and process your personal data, and how, in doing so, we comply with our legal obligations to you. We are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our guests, the responsible person making the online reservation booking or making a request by email (whether included in the guest group or otherwise), and website users.

This Privacy Policy specifically excludes entities with their own privacy policies that may be involved in making a booking with and payments to Ballynoe House, including but not limited to:

- Stripe (online credit card payments);
- AIB (receipt of bank transfers and payments);
- Social media (e.g., Facebook, Instagram, Twitter);
- Family tree information & DNA test results using Ancestry, MyHeritage, FamilyTreeDNA, and/or GEDmatch.

## **The kind of personal data we collect**

*Reservation & Booking Data:* Bookings from the Ballynoe House website are routed through FreetoBook & the Stripe credit card payments system. This provides Ballynoe House with the basic details confirming a booking has been made and by whom, i.e., booking reference, name and registered address of the person making booking, telephone number, email address, the property to be let and the status of the payment (pending, balance or full amount).

*Guest-Specific Data:* We usually make enquiries about the general make-up of the letting group for the sole purpose of advising bedroom options, so that sleeping accommodation can be prepared ahead of arrival. This includes basic group dynamics such as interpersonal relationships, approximate ages, and gender of children, and if any child is under the age of two years requiring the use of the optional travel cot and highchair.

*Website Users:* We collect a limited amount of data from website cookies which we use to help us understand how our website is used. This does not contain personal data.

## **How we collect your personal data**

We collect personal data in two ways:

- Personal data that you provide us as our guests;
- Personal data that we receive from other sources through the process of you making reservations, bookings, and payments.

## **Personal data provided by you**

Ballynoe House needs certain information about you to provide you with guesthouse rental accommodation and access to Ballynoe House, which is private property and the owner's home.

The ways you can share your information with us may include:

- Entering your details on the FreetoBook booking engine as part of the booking process;
- By email to Ballynoe House;
- Providing information through online messaging systems as part of Facebook, Skype, WhatsApp, or mobile text message.

For the duration of your stay, you will be asked to provide an emergency contact (mobile) number.

When using the services of the resident genealogist, you may provide basic vital data about living people as part of investigations into your family tree, however any online services will be set-up and in full control of you.

## **How we use your personal data**

Data is used for:

- Establishing a legal contract for the provision of holiday letting accommodation;
- Identification of the responsible person for the booking, and where not in the guest group, the responsible group leader with respect to accepting Ballynoe House's Online Booking Terms & Conditions as part of the booking contract with us;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to your booking;
- Business records of booking receipts for income tax and VAT reporting to the Revenue service in Ireland.
- Contact details for notification of national health authorities (and law enforcement, where appropriate) for the tracking and tracing of individuals who have been infected with or suspected as having come into contact with a person infected with Covid-19 or other infectious diseases.

## **Who do we share your personal data with?**

We do not share your data unless you request us to do so (for external bookings and services) or we are required to by law. Payments made by you are subject to audit for the purposes of annual Revenue (business & income tax) and bi-monthly VAT filing. This is limited to the person who made the original booking and payments only. This data is also provided to our accountants.

## **How we safeguard your personal data**

We care about protecting your information. We have taken appropriate measures to prevent unauthorised access to, and misuse of, your personal data.

### **How long we keep your personal data for**

Personal data of the person making the reservation or booking and making online payments will be kept as required by law and the Irish Revenue service, for up to seven years, as part of business accounts.

Details of the group will be kept for a sufficient period after a stay to facilitate any track and trace requirements for national health authorities track and trace programmes in relation to Covid-19 or other national health emergencies.

### **How you access, amend, or take back the personal data that you have given to us**

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even after you have given it to us.

Please contact us if you wish to exercise your rights, and we will seek to deal with your request without undue delay. In any event, within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

*Right to withdraw consent:* Where we have obtained your consent to process your personal data through making a reservation, booking or cancellation, you may withdraw your consent at any time.

*Data Subject Access Requests (DSAR):* You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information.

*Right to erasure:* In certain situations (for example, if your data has been processed unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days and will only disagree with you if a contract with you has not been closed by cancellation or your stay at Ballynoe House has not been completed.

*Right of data portability:* If you wish, you have the right to transfer your data from us to another data controller.

### **How we store and transfer your data internationally**

We do not transfer or store your data internationally. It will remain within the borders of the Republic of Ireland.

### **The Legal Basis for Processing Your Data**

As a business, it is reasonable to expect that if we are providing holiday rental accommodation and access to the private property that is Ballynoe House that you provide basic personal information that identifies you as a person legally-entitled to enter into a contract and make payments for the accommodation. In accepting the Ballynoe House Online Terms & Conditions and making certain payments you are accepting of the fact certain information is required from you.

## **Consent**

Article 4(11) of the GDPR states that (opt-in) consent is “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.” In simple terms, this means that:

- You must give us your consent freely, without us putting you under any type of pressure;
- You must know what you are consenting to. We provide necessary and required information on our website and in our Booking Terms & Conditions ahead of you accepting to make a payment;
- You should have control over which processing activities you consent to and which you do not;
- You need to take positive and affirmative action in giving us your consent.

The booking systems and any emails provide us with the record of the consents that you have given in this way.

## **How you can contact us**

- To access, amend or take back the personal data that you have given to us;
- If you suspect any misuse or loss of or unauthorised access to your personal information;
- To withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);
- With any comments or suggestions concerning this Privacy Policy.

You can write to us at the following address:

Mark & Felicity Grace T/A Ballynoe House,  
Ballynoe House,  
Dunowen, Ardfield,  
Clonakilty, County Cork,  
P85 YR23,  
Republic of Ireland

Alternatively, email us: [info@ballynoehouse.ie](mailto:info@ballynoehouse.ie)

This Privacy Policy was reviewed and updated on 1<sup>st</sup> June 2022

**BALLYNOE  
HOUSE**