Privacy & Cookies

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Privacy Policy

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.

1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. Credit

2.1 This document was created using a template from [SEQ Legal](http://www.seqlegal.com/).

3. Collecting personal information

3.1 We may collect, store and use the following kinds of personal information:

* (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
* (b) information that you provide to us when registering with our website (including your email address);
* (c) information that you provide when completing your profile on our website (including your name, pictures, gender and date of birth);
* (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
* (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
* (f) information relating to any purchases you make of our goods and/or services or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details);
* (g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);
* (h) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication).

3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

4. Using personal information

4.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

4.2 We may use your personal information to:

* (a) administer our website and business;
* (b) personalise our website for you;
* (c) enable your use of the services available on our website;
* (d) supply to you services purchased through our website;
* (e) send statements, invoices and payment reminders to you, and collect payments from you;
* (f) send you email notifications that you have specifically requested;
* (g) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
* (h) send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
* (i) deal with enquiries and complaints made by or about you relating to our website;
* (j) keep our website secure and prevent fraud;
* (k) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service).

4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.

4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4.6 All our website financial transactions are handled through our payment services providers. You can review the provider's respective privacy policies on their websites. We will share information with our payment services providers only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

5. Disclosing personal information

5.1 We may disclose your personal information to any of our employees, officers, insurers or professional advisers, insofar as reasonably necessary for the purposes set out in this policy.

5.2 We may disclose your personal information:

* (a) to the extent that we are required to do so by law;
* (b) in connection with any ongoing or prospective legal proceedings;
* (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
* (d) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

5.3 Except as provided in this policy, we will not provide your personal information to third parties.

6. International data transfers

6.1 Information that we collect may be stored and processed in and transferred between multiple countries in order to enable us to use the information in accordance with this policy.

6.2 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

6.3 You expressly agree to the transfers of personal information described in this Section 6.

7. Retaining personal information

7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.3 Notwithstanding the other provisions of this Section 7, we will retain documents (including electronic documents) containing personal data:

* (a) to the extent that we are required to do so by law;
* (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
* (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

8. Security of personal information

8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

8.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.

8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

9. Amendments

9.1 We may update this policy from time to time by publishing a new version on our website.

9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

9.3 We may notify you of changes to this policy by email.

10. Your rights

10.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

* (a) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor).

10.2 We may withhold personal information that you request to the extent permitted by law.

10.3 You may instruct us at any time not to process your personal information for marketing purposes.

10.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

11. Third party websites

11.1 Our website includes hyperlinks to, and details of, third party websites.

11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

12. Updating information

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

13. Cookies

13.1 Our website uses cookies.

13.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

13.5 We use both session and persistent cookies on our website.

13.6 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

* (a) we use cookies on the folder cookies on our website to recognise a computer when a user visits the website, track users as they navigate the website, enable the use of a shopping cart on the website, improve the website's usability, analyse the use of the website, administer the website, prevent fraud and improve the security of the website and personalise the website for each user.

13.7 Most browsers allow you to refuse to accept cookies; for example:

* (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
* (b) in Firefox (version 36) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
* (c) in Chrome (version 41), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

13.8 Blocking all cookies will have a negative impact upon the usability of many websites.

13.9 If you block cookies, you will not be able to use all the features on our website.

13.10 You can delete cookies already stored on your computer; for example:

* (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at [http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11);](http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11)
* (b) in Firefox (version 36), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
* (c) in Chrome (version 41), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

13.11 Deleting cookies will have a negative impact on the usability of many websites.

14. Our details

14.1 This website is owned and operated by Greccia Hotel, Dhermi.

14.2 Our registered office is at Dhermi, Albania.

14.3 You can contact us by writing to the business address given above, by using our website contact form, by emai or by telephone.

Data Protection

1. Data protection principles

All our online data is handled by Hotel Link Solutions. Hotel Link Solutions is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

* a. processed lawfully, fairly and in a transparent manner in relation to individuals;
* b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
* c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
* d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
* e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
* f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

* a. This policy applies to all personal data processed by Hotel Link Solutions.
* b. The Responsible Person shall take responsibility for Hotel Link Solution’s ongoing compliance with this policy.
* c. This policy shall be reviewed at least annually.
* d. Hotel Link Solutions shall register with the EU authorities as an organisation that processes personal data.

3. Lawful, fair and transparent processing

* a. To ensure its processing of data is lawful, fair and transparent, Hotel Link Solutions shall maintain a Register of Systems.
* b. The Register of Systems shall be reviewed at least annually.
* c. Individuals have the right to access their personal data and any such requests made to Hotel Link Solutions shall be dealt with in a timely manner.

4. Lawful purposes

* a. All data processed by Hotel Link Solutions must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/)).
* b. Hotel Link Solutions shall note the appropriate lawful basis in the Register of Systems.
* c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
* d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Hotel Link Solutions’ systems.

5. Data minimisation

* a. Hotel Link Solutions shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
* b. Hotel Link Solutions collects web site data via cookies and names and email addresses for those people subscribing to our email service and who book trips via the site. We also collect email addresses and telephone numbers of people wanting custom Trip Plans.

6. Accuracy

* a. Hotel Link Solutions shall take reasonable steps to ensure personal data is accurate.
* b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

* a. To ensure that personal data is kept for no longer than necessary, Hotel Link Solutions shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
* b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

* a. Hotel Link Solutions shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
* b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
* c. When personal data is deleted this should be done safely such that the data is irrecoverable.
* d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

* In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Hotel Link Solutions shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the [ICO](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/)