

Privacy Policy

This Privacy Policy governs the manner in which EasyOTA Ltd collects, uses, maintains and discloses information collected from users (each, a 'User') of the EasyOTA website ('Site'), as well as any other channel including Social Media.

EasyOTA Ltd (<https://www.easyota.com>), UK Reg. No. 10536693.

EasyOTA Ltd is committed to protecting your data and privacy. This Privacy Policy governs the manner in which we collect, use, maintain and disclose information collected from you (the 'User') in accordance with the General Data Protection Regulation (GDPR) 2018, and outlines our aim to maintain best-practice standards in our processing of personal and/or sensitive personal data. This Privacy Policy applies to the EasyOTA website (the 'Site') and all products and services offered by EasyOTA.

How we collect your data

Personal identification information

We may collect personal identification information from you in a variety of ways, including, but not limited to, when you visit our Site, register on the Site, subscribe to the newsletter, fill out a form, send an enquiry via email, or contact us by telephone, and in connection with other activities, services, features or resources we make available on our Site. We may collect a variety of information including your name, email address, postal address, telephone number, contact preferences and credit/debit card information. We will not collect or store more data than the minimum information required for its intended purpose. We will only collect personal identification information from you if you voluntarily submit such information to us.

Non-personal identification information

We may collect technical data from you when you interact with our Site. This may include the browser name, the type of computer and technical information about your connection to our Site, such as the operating system, your Internet Protocol (IP) address, and the Internet Service Provider utilised, data collected through cookies and other similar information.

Web browser cookies

Our Site may use 'cookies' to enhance the User experience. A cookie is a small text file that is downloaded onto 'terminal equipment' e.g. a computer or smartphone, when you access a website. The cookie allows the website to recognise your device and store some information about your preferences or past actions. You can set your browser to notify you when you receive a cookie,

this enables you to decide if you want to accept it or not. You may also choose to set your web browser to refuse cookies, however if you do so, note that some parts of the website may not function properly.

How we use your data

EasyOTA may collect and use your personal information for the following purposes:

To process your enquiry and provide you with services

We may also use this information to contact you in case there is a question or problem with your booking. We do not share this information with outside parties except to the extent necessary to provide the service.

To enhance or improve your user experience with us

To improve customer service; information you provide helps us respond to your customer service requests and support needs more efficiently.

To personalise user experience; we may use information in the aggregate to understand how users of our website use the services and resources provided on our Site.

To improve our Site; we may use feedback you provide to improve our products and services.

To provide you with information about our services

We may use the contact details provided to send information and updates pertaining to your booking. They may also be used to respond to enquiries, and/or other requests.

To provide you with information you have requested, or we feel may be of interest to you.

We may contact you to conduct market research and surveys.

To allow you to participate in interactive features on our Site.

To send marketing emails – If you opt-in to our mailing list, you will receive emails that may include company news, updates, related product or service information, etc. We will only do this with your consent. You can change your mind and remove or add your consent at any time. Unsubscribe instructions are included at the bottom of every marketing email, or you may contact us via our Site.

The legal grounds we use for processing personal information

We are not allowed to process personal information if we do not have a valid legal ground. Therefore, we will only process your personal information for the purposes outlined above because:

- the information is required to carry out the activities that form part of the operation of our business ie. the processing is necessary to perform our **contractual obligations** towards you.
- the processing is **necessary for compliance with a legal obligation** to which we are subject or
- the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. This includes dealing with your enquiries, sending you information you have requested, conducting market research, improving the functionality and content of our website; or
- you have given your **consent** to have your personal information processed for direct marketing purposes and promotional activities

How we protect your information

We adopt appropriate data collection, storage and processing practices, and security measures to protect against unauthorised access, alteration, disclosure, or destruction of your personal information, username, password, transaction information, and data stored on our Site. We will take all reasonable steps to protect your personal information, but the transmission of data over the internet (including email) 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.

Sharing your personal information

We do not sell, trade, or rent your personal identification information, and will never disclose information about you to third parties, except:

1. Financial transactions relating to our services are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
2. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.
3. We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or

surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

Third party websites

Users may find advertising or other content on our Site that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors, and other third parties. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

Accessing your personal information

You have a statutory right to access any personal information that we hold about you, how we obtained it, and to whom we may pass it on. Provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

To exercise this right, your application must be in writing to the Data Controller, EasyOTA at consult@easyota.com

You can also ask us to correct, update or delete any inaccurate personal data. We will consider and respond to all requests in accordance with applicable law.

Retaining and deleting personal information

We will retain any personal information we need to provide you with any service you buy for the period during which we provide that service to you, and for a period of 12 months following the service, unless there is a legal requirement to keep records.

We may keep your contact details for as long as we have your consent to send you marketing information. You may instruct us at any time not to process your personal information for marketing purposes.

You have the right to ask that we delete personal data that we hold about you (known as the right to be forgotten) or restrict the way in which we use such

personal data. You also have the right to object to our processing of your personal data.

Right to complain

To exercise any of your rights, or if you have any questions about this Privacy Policy, a concern, or think there is a problem with the way we are handling your personal information, please contact the Data Controller in the first instance by email at consult@easyota.com. We will take reasonable steps to work with you to attempt to resolve your complaint.

If your complaint cannot be resolved by us, you have the right to raise your concern with the Information Commissioner's Office (ICO).

Changes to this privacy policy

EasyOTA has the discretion to update this Privacy Policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage you to frequently check this page for any changes about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Your acceptance of these terms

By using this Site, you signify your acceptance of this Policy and Terms of Service. If you do not agree to this Policy, please do not use our Site. Your continued use of the Site following the posting of changes to this Policy will be deemed your acceptance of those changes.

This policy was last updated on 12 April 2020 in accordance with the GDPR