**Privacy Policy**

At **Kenmakos Apartments**, we are dedicated to consistently upholding our esteemed quality of service. Kenmakos Apartments (“We”) are equally dedicated to protecting and respecting your Personal Data at all times. The use of your personal information is regulated by this Privacy Policy and any other referenced documents.

1. **Introduction**

Our Privacy Policy sets out the guidelines for processing the personal data we collect from you. Acting as a Data Controller, **Kenmakos Apartments** handles your personal information confidentially. By visiting **Kenmakos Apartments**, you implicitly consent to the practices detailed in this policy. For enquiries regarding data protection, you can contact our Data Protection Compliance at **Kenmakos Apartments**, using the provided Data Protection Number: [C1525680]. Aligned with the General Data Protection Regulations, we ensure the lawful handling of guest information for stays in our short-term rentals.

Upholding our commitment to privacy, we treat the information gathered during the booking process with utmost respect and adherence to legal standards. At **Kenmakos Apartments**, we maintain our renowned quality of service while prioritising the protection and respect of your Personal Data. Our Privacy Policy, in conjunction with other referenced documents, governs the use of your personal information, reflecting our dedication to transparency and compliance.

1. **Data Collected through the Website [Kemnmakosapartments.com]:**

**Kenmakos Apartments** may collect personal information from users under the provisions of this Privacy Policy, which can be defined as information that identifies you or can be combined with other data to identify you. **Kenmakos Apartments** may process the following data:

* Users may provide information about themselves by completing forms on **www.kenmakosapartments.com** or by corresponding with us via phone, email, or other means. This includes information provided during registration for a Customer Account, such as name, email address, postal address, billing address, telephone number, username, and password.
* Users may also provide information about the properties they advertise using our Services, including the property address.
* During each user visit to **www.kenmakosapartments.com**, we may automatically collect technical information, including the Internet Protocol (IP) address used to connect users’ computers to the Internet, login information, browser type and version, time zone settings, browser plug-in types and versions, operating system, and platform.
* **Kenmakos Apartments** may also gather information about users’ visits to www.kenmakosapartments.com, including the full Uniform Resource Locators (URL) clickstream to, through, and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page, as well as any phone number used to call our customer service number.
* **Kenmakos Apartments** does not collect payment card details of our users. To pay for the fees related to our Services, we use third-party payment processors that will collect and process the payment card details of our users.
* **Kenmakos Apartments** collaborates closely with third parties (including business partners, sub-contractors in technical, payment, and delivery services, advertising networks, and analytics providers) and may receive information about users from them.

1. **Purposes of Processing**

The purposes for which the personal data are processed are the following:

• Providing users with **Kenmakos Apartments** Services.

• Supporting users in utilising the Services.

• Tailoring the Services to meet individual user needs.

• Informing users about Service updates.

• Responding to user enquiries submitted through website.

• Offering information about related services, subject to user consent. Users will have the option to opt out of receiving commercial communications.

• Analysing Service usage patterns to enhance user experience and effectiveness.

• Assessing advertising effectiveness and delivering relevant ads.

**Kenmakos Apartments** commits not to engage in personal data profiling or automated decision-making based on such data.

1. **Data Utilisation**

We will utilise your personal information lawfully and employ the information we hold about you in the following manners:

• Your name, address, and credit/debit card details may be utilised to process your short-term rentals booking, even if arranged through an agent.

• Your details will be used to furnish you with requested information, products, and services, manage your booking, send notifications, and maintain general communication with you.

• You will receive information about other short-term rentals (e.g. vacation homes, condos, villas, studious or cabins) and/or services similar to those you have already purchased or enquired about.

• We will ensure that content from our site is presented in the most effective manner for you and your computer.

• To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

• To enhance our site and ensure that content is optimally presented for you and your computer.

• To facilitate your participation in any interactive features of our service, should you choose to do so.

• To maintain the safety and security of our site as part of our ongoing efforts.

• To assess the effectiveness of advertising we provide to you and others, and to deliver pertinent advertising to you.

• To offer suggestions and recommendations to you and other users of our site regarding goods or services that may be of interest.

We may merge this information with details you provide to us and information we collect about you. We may use this information and the merged data for the purposes outlined above (dependent on the types of information we receive).

Additionally, if we are offering a service to you, or on your behalf, where required by law, we may request a copy of your passport. The lawful grounds (reasons) typically used for processing your personal information are:

Where necessary to perform the contract between **Kenmakos Apartments** (contractual obligation):

• Personal information is used to fulfill our contractual obligation to you in providing a vacation home including (but not limited to) processing your payment, coordinating key collection and check-in, and furnishing arrival and stay information.

• If parking has been arranged, your vehicle registration number will be shared with any apartment management company and/or car park operator to ensure smooth parking and avoid penalty notices.

• Guest names (if over 16 years of age) and contact details will also be shared with other third parties such as our administration teams, housekeeping and cleaning teams, maintenance contractors, and security and reception teams to aid in fulfilling our contractual obligation to you in providing a serviced apartment.

Where necessary for our legitimate interests (or those of a third party), ensuring your interests and fundamental rights are respected, including:

• Pre-booking and post-booking communications with you

• Record-keeping for book-keeping, accounting, banking, and tax reporting

• Reporting occupancy and revenue

• Monitoring client expenditure and credit

• Evaluating website and customer service performance

• Preventing fraud and managing debt

• Responding to chargeback and refund requests

• Requesting and responding to reviews

• Reporting guest misconduct and suspected criminal activity, including fraud, drug-related activities, and child exploitation

Where required to comply with a legal or regulatory obligation:

We may process personal information due to legal obligations, such as those under The Immigration (Hotel Records) Regulations. This may also occur when requested by law enforcement or crime prevention agencies regarding suspected criminal activity, including fraud, drug-related activities, and child exploitation. Local councils may also request information concerning the use of our apartments.

With your permission and agreement (consent): We generally do not rely on consent as a legal basis for processing your personal data, except for sending marketing communications via post, phone, email, SMS, WhatsApp, Messenger, or similar channels.

Marketing by **Kenmakosapartments**:

By opting to stay with us, you expressly consent to receive marketing communications from [www.kenmakosapartments.com](http://www.kenmakosapartments.com) before, during, and after your booking.

You have the right to withdraw consent for any and all direct marketing activity across all or selected channels. We must comply with your request because whenever you provide consent for processing your personal data, you have the right to change your mind and revoke that consent at any time.

You can withdraw consent for marketing by emailing contact@kenmakosapartme nts.com or clicking the unsubscribe button in any marketing email from us.

Marketing by third parties:

We do not share personal data with third parties for marketing purposes. However, should a circumstance arise requiring this, we will obtain your separate, express opt-in consent before sharing your personal data with any third party for marketing purposes.

1. **Data Storage**

The data shall only be stored for the time strictly required for each purpose of the processing and shall promptly be deleted straight afterwards, without prejudice to the legal storage obligations provided for by the law. According to that:

• In case where users purchase **Kenmakos Apartments** products or subscribe to **Kenmakos Apartments** Services through the website, the personal data will be kept as long as the contractual relationship between the parties is maintained and, in any case, until legal liabilities are extinguished definitively (by expiry of the statute-of-limitations period).

• In all other cases, the personal data provided will be kept as long as the data deletion is not requested by the user. Likewise, data will be kept according to the legal time frame set forth in legal, fiscal, and accounting matters, taking as reference the date of the request for data deletion.

The data **Kenmakos Apartments** collects from you is stored within the European Economic Area (“EEA”). It may be processed by staff outside the EEA who work for **Kenmakos Apartments** or **Kenmakos Apartments** partners to fulfil bookings, process payments, or provide support services. We ensure your data’s security and protection, aligning with EEA standards.

By submitting your personal data, you consent to **Kenmakos Apartments** managing its transfer, storage, or processing. **Kenmakos Apartments** will take all necessary steps to ensure your data’s secure treatment in line with this Privacy Policy. Unfortunately, internet transmissions aren’t entirely secure. While **Kenmakos Apartments** strives to protect your data, please note that transmission risks exist. Once received, **Kenmakos Apartments** employs strict procedures and security measures to prevent unauthorised access.

1. **Legal Basis for Processing**

The legal bases for the processing are the following:

• In compliance with legal obligations.

• In case users purchase or subscribe to **Kenmakos Apartments** Services through the website, the legal basis for the processing is the performance of the contract entered into by the parties.

• In pursuit of **Kenmakos Apartments** legitimate interests, provided they do not override your interests and fundamental rights. These activities include:

* Promoting our business, brands, and products, and assessing campaign effectiveness. This may involve sending marketing information after you’ve engaged us for services or expressed interest in receiving such information, with the option to opt-out.
* Enhancing our understanding of the real estate sector through market analysis and research, enabling us to offer tailored services in the future.
* Operating administrative and technical aspects efficiently, such as verifying information accuracy, outsourcing administrative functions, and ensuring network and information security.
* In more limited circumstances, legal bases may include:

◦ Protection of your interests or others’.

◦ Public interest or official purposes.

* In all other cases, the legal basis for the processing is the consent provided by the user at the point of data collection, along with a clear explanation of its purpose.

1. **Disclosure of Your Information**

Users’ personal data may be disclosed to third parties, namely companies that render services to **Kenmakos Apartments**.These third parties are:

* **Kenmakos Apartments** administration teams.
* **Kenmakos Apartments** housekeeping and cleaning teams.
* **Kenmakos Apartments** security and reception teams.
* The freeholders (and/or superior leaseholders) of any building and/or apartment from which we operate.
* **Kenmakos Apartments** IT and system service providers.
* **Kenmakos Apartments** card payment processors, including but not limited to Worldpay and Stripe.
* **Kenmakos Apartments** professional advisers, such as lawyers, bankers, auditors, and insurers, providing consultancy, banking, legal, insurance, and accounting services.
* HM Revenue & Customs, regulators, and other authorities in the United Kingdom and relevant jurisdictions requiring reporting of processing activities under certain circumstances.
* Advertisers and advertising networks requiring data for selecting and serving relevant adverts (individuals’ information remains undisclosed). • Analytics and search engine providers aiding **Kenmakos Apartments** in the enhancement and optimisation of our site.
* Third parties to whom **Kenmakos Apartments** sells, transfers, or merges parts of our business or assets.

When sharing data with third parties, we ensure the following:

* Only necessary information is provided for their specific services.
* Data provided is used solely for purposes outlined in our contract.
* Data is held securely and privacy is upheld.
* Upon cessation of services, any data held by third parties (unless legally obligated or having a legitimate interest) will be deleted.

Some personal data of our users may be stored in or transferred to a destination outside the United Kingdom. It may also be processed by staff operating outside the United Kingdom who work for **Kenmakos Apartments** or one of our business partners or service providers.

By using the Services, users acknowledge and agree that we may be transferring, storing and processing their personal data outside of the country in which they reside. **Kenmakos Apartments** will take all reasonable steps necessary to ensure that users’ data are treated securely.

**Kenmakos Apartments** also may disclose personal data of our users as required by law, or when we believe in good faith that disclosure is necessary to protect our rights, protect the safety of our users or the safety of others, investigate fraud, or respond to a government request.

We may disclose your personal information to third parties in the following circumstances:

* If **Kenmakos Apartments** sells any part of the business to a third party, personal data held by it, about its customers may be one of the transferred assets, provided that the recipient is compliant with the EU GDPR.
* **Kenmakos Apartments** may share your information with organisations acting as “data processors” on our behalf, or with other entities performing business functions on our behalf, some of which may be located outside the UK/European Economic Area. These functions include

administration, service provision (and contacting you when necessary), customer care, business management and operation, re-organisation/structuring/sale of our business (or our group companies), risk assessment, security and crime prevention/detection, research and analysis, marketing, monitoring, measuring, and assessing customer purchasing preferences and trends, dispute resolution, credit checking, and debt collection.

1. **Data Retention**

We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements.

Completed Bookings

* Personal data provided during booking will be retained indefinitely to comply with contractual and legal obligations and to defend against potential claims.

Failed or Cancelled Bookings

* Personal data provided during failed or cancelled bookings will also be retained indefinitely for the same reasons.

International Transfers

Countries outside the European Economic Area (EEA) may not offer the same level of protection for personal data. European law restricts transfers of personal data outside the EEA unless specific criteria are met.

* Many of our third-party service providers operate outside the EEA, necessitating data transfers outside the region. •
* To ensure data security, we implement various safeguards when transferring your personal data outside the EEA:

◦ **Kenmakos Apartments** only transfer data to countries deemed by the European Commission to provide adequate protection.

◦ With certain service providers, **Kenmakos Apartments** utilises specific contracts, codes of conduct, or certification mechanisms approved by the European Commission, ensuring data protection equivalent to that in Europe.

The EU GDPR grants individual’s specific rights regarding the collection, storage, and use of their data.

1. **Rights of the Data Subject**

Each user (data subject) has the following rights regarding their personal data:

a) Right of Confirmation: To obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself or herself of this right of confirmation, he or she may at any time contact our data protection manager or another employee of the controller.

b) Right of Information and Access: To be informed about the usage of their personal information. They retain the right to access their personal information held by the organisation.

c) Right to Correction and Erasure: To request correction or erasure of any inaccuracies, incompleteness, or inaccuracies in their personal information. They may request the erasure of personal data under specific circumstances, including:

• The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.

• The data subject withdraws consent, which was the basis for processing, according to [UK GDPR/EU GDPR], and there is no other legal ground for the processing.

• The data subject objects to the processing as per [UK GDPR/EU GDPR], and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to [UK GDPR/EU GDPR].

• The personal data have been unlawfully processed.

• The personal data must be erased to comply with a legal obligation under Union or Member State law to which the controller is subject.

• The personal data have been collected concerning the provision of information society services referred to in [UK GDPR/EU GDPR].

d) Right of Restriction of Processing: To request the restriction of data processing where one of the following applies:

• The data subject contests the accuracy of the personal data, allowing the Controller a period to verify its accuracy.

• The processing is unlawful, and the data subject opposes the erasure of the personal data, instead requesting the restriction of their use.

• The controller no longer requires the personal data for processing purposes, but they are necessary for the data subject to establish, exercise, or defend legal claims.

• The data subject has objected to processing pursuant to [Federal/StateDataRegulation], awaiting verification of whether the controller’s legitimate grounds override those of the data subject.

f) Right to data portability: To receive their personal data from a controller in a structured, commonly used, and machine-readable format. They can transmit this data to another controller without hindrance if the processing is based on consent and is automated.

Additionally, under [UK GDPR/EU GDPR], data subjects have the right to direct transmission of their personal data from one controller to another, where technically feasible and without adversely affecting the rights and freedoms of others.

g) Right to Data Copy and Objecting Processing: To request a copy of certain personal information provided to the organisation. They possess the authority to object to processing of personal information, especially where the organisation relies on legitimate interests or public interest tasks.

h) Right of Automated Decisions: Individuals shall not be subjected to wholly automated decisions with legal effects or significant impact

i) Right to Consent and Preferences: The organisation may solicit preferences concerning receiving offers, marketing, and promotional information, and participation in surveys. Consent may be implied or expressly sought, particularly for Sensitive Personal Information, based on the circumstance and applicable laws.

Furthermore, each user has the right to access and update their personal data. Requests can be made via post or email, including full name, address, telephone number, and a copy of an identity document. The organisation aims to provide this information within 30 days, free of charge. Users may also request corrections or deletions of their personal information, which the organisation will address accordingly.

1. **Data Security**

We are dedicated to ensuring the security of users’ information. To prevent unauthorised access or disclosure, **Kenmakos Apartments** has implemented appropriate physical, electronic, and managerial procedures to safeguard and protect the information collected online.

When users input sensitive information on our site, **Kenmakos Apartments** encrypts the transmission using secure socket layer technology (SSL).

However, it’s important to note that no data transmission over the Internet or storage technology can be guaranteed to be completely secure. While we strive to protect users’ information, we cannot guarantee the security of information sent to us, and users do so at their own risk.

1. **External Links**

Please note that **www.kenmakosapartments.com** contains certain literature and hyperlinks to websites owned by third parties. The Privacy Policy covers websites owned and controlled by the organisation only. Links to other websites and any information collected by these sites are not covered by the privacy statement.

Users are reminded that they can withdraw their consent at any time by changing their marketing preferences or unsubscribing using the link at the bottom of the emails sent by the organisation (this could either be an “unsubscribe” link or a “manage my preferences” link), or by sending an email to [contact@kenmakosapartments.com](mailto:contact@kenmakosapartments.com).

1. **Cookies**

**www.kenmakosapartments** uses cookies. The web user has the option to prevent the generation of cookies, by selecting the corresponding option in their browser program.

1. **Validity and modifications**

**Kenmakos Apartments** reserves the right to modify, either wholly or partially, this Privacy Policy. Any changes or alterations will be published in the same manner as these conditions appear or communicated directly to users, as determined by **Kenmakos Apartments**.

The temporary validity of this Privacy Policy aligns with its period of exposure, until it is wholly or partially modified. In such cases, the modified version will become the valid one.