

# ALTIDO Privacy Notice

Last updated on 05/12/23

ALTIDO, launched in 2019, represents a fresh approach to global property and hospitality management; delivering operational excellence and a guest-centric experience across a portfolio of distinctive properties in many of Europe's most desirable destinations. ALTIDO offers the modern traveller, owners and property investors, a new vision of quality standards and experience that bridges the gap between private accommodation and hotels.

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## ? What is this notice all about?

We want to be completely transparent about how we collect and use your personal data and this privacy notice exists to tell you exactly how we do this.

This notice applies wherever we decide why and how we process personal data (and therefore act as a Data Controller under data protection law). It covers the personal data we process when you use our services. This applies to all ALTIDO entities, in England (Altido England Ltd), Scotland (Altido Scotland Ltd), Portugal (Altido Portugal Unipessoal Lda) and Italy (Altido Italy Srl).

Our privacy notice tells you the journey of your personal data from the moment it enters our systems up until it's time for us to say "goodbye 🙋\*\*\*", as well as the various stops it makes along the way.

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## 👉 The different ways we process personal data

- **When you reserve a stay at one of our properties (for guests)**
  - 📁 **What personal data do we collect, why do we collect it, and what legal basis do we rely on?**

Personal data is anything that can identify an individual, either on its own or through combining it with other factors that could eventually identify an individual.

**When you reserve a stay at one of our properties**, we'll need some information about you & your guests, including your names, email addresses, your best contact information, length of your stay, and verification of your identities (photo ID). For some territories we may also collect date of birth, home address, country of residency and gender. For this collection we rely on

Article 6(1)(b) of the GDPR - Contractual obligation to collect this data, as it is required for us to provide this service to you.

To be able to **process any payments** you make to ALTIDO, we need to collect your name, credit card, address, mailing address, email address and payment amount (including deposits and/or other fees (excluding city tax)). For this collection we rely on Article 6(1)(b) of the GDPR - Contractual obligation.

**When you make use of our feature ALTIDO Experiences**, we will share information about you with our trusted partner including name, booking ID, experience booked and money paid.

**When you make use of our feature ALTIDO Transfers**, we will share information about you with our trusted partner including name and journey booked. We will have access to the transfer and occasionally, for example if a flight is significantly delayed, we will track the transfer in order to ensure our representative is ready to meet you at the property in time.

**We provide a Guest Portal**, for you to access, and which you use to check in to your stay, where we will store information about your booking, including dates, extras, and destination. Where this is a requirement, we use this information to pay city taxes or to provide information to local authorities.

**When you make use of our feature Explore Portal**, we will share some of your booking information with our trusted partner to bring you extra information about the destination, including recommendations for local attractions such as restaurants.

We will share relevant booking information with a trusted partner to provide insurance information for your stay.

We also regularly **monitor the use of our platform** and services and we may collect analytics such as your device ID, IP address. We will rely on Article 6(1)(f) of the GDPR - Legitimate interest when using and collecting this data as we require its use in order to improve our product and services provided to you.

- **Where do we store it?**

We use different data processors and suppliers to manage our services. These can be providers used to host our platform, trusted partners to provide access to additional services such as ALTIDO Explore, ALTIDO Transfers, ALTIDO Experiences and insurance providers, data warehouses, tools used to get in touch with our customers via email and to authenticate users, electronic signature providers, internal instant communication providers and user communication providers, video telephony providers (VoIP), CRM tools, tools used to create forms, financial tools that record and manage our payments, analytics tools, business intelligence tools, tools used to fix bugs

and issues on the platform as well as various API integrations used to provide our services.

If you are currently a user of ALTIDO and would like a list of where your data resides, please get in touch using the contact details below.

- **How long do we keep it for?**

We keep the personal data collected used to verify your identity for your booking for the duration of your stay and for one month afterwards. For any financial information or records that we are required to keep for a proscribed period of time, we will keep them for such prescribed period. We will rely on Article 6(1)(c) of the GDPR - Legal Obligation

- **When you list your property with our platform (for owners)**

- **What personal data do we collect, why do we collect it, and what legal basis do we rely on?**

Personal data is anything that can identify an individual, either on its own or through combining it with other factors that could eventually identify an individual.

**When you agree to list your property with ALTIDO**, we'll need some information about you, such as your name, email address, contact information, property address, forwarding address, VAT Number (if applicable) and verification of your identify (usually a photo ID). We will rely on Article 6(1)(b) of the GDPR - Contractual obligation to collect this data, as it is required for us to provide this service to you.

**We will need information about your property**, including photos of the interior, details of appliances, TV licence, EICR certificate, gas safety certificate, utilities, number of bedrooms, details about parking options, details about any security alarms installed, and any other relevant information. We will rely on Article 6(1)(b) of the GDPR - Contractual obligation to collect this data, as it is required for us to provide this service to you.

**When you hand over your keys**, we will collect your name, email address, address, and make 5 sets of keys, take photos of the keys and of your alarm system and code. We will rely on Article 6(1)(b) of the GDPR - Contractual obligation to collect this data, as it is required for us to provide this service to you.

**When you decide which of platforms (Online Travel Agents) you wish to be listed on**, we will share your name, email address, and property listing details with these other platforms. We will rely on Article 6(1)(b) of the GDPR - Contractual obligation to collect the data required for us to provide this service to you.

We also regularly **monitor the use of our platform** and services and we may collect analytics such as your device ID, IP address. We will rely on Article 6(1)(f) of the GDPR - Legitimate interest when using and collecting this data as we require its use in order to improve our product and services provided to you.

- **Where do we store it?**

We use different data processors and suppliers to manage our services. These include providers used to host our platform, data warehouses, tools used to get in touch with our customers via email and to authenticate users, electronic signature providers, internal instant communication providers and user communication providers, video telephony providers (VoIP), CRM tools, tools used to create forms, financial tools that record and manage payments, analytics tools, business intelligence tools, tools used to fix bugs and issues on the platform as well as various API integrations used to provide our services.

If you are currently a user of ALTIDO and would like a list of where your data resides, please get in touch using the contact details below.

- **How long do we keep it for?**

We keep the personal data mentioned for the duration of your account with us and for two and a half years after you left us, in line with our business needs, unless you ask us to delete it sooner.

For any financial information or records that we are required to keep for a prescribed period of time, we will keep them for such prescribed period of time. We rely on Article 6(1)(c) of the GDPR - Legal Obligation

- **When we raise awareness of our business**

- **What personal data do we collect, why do we collect it, and what legal basis do we rely on?**

Personal data is anything that can identify an individual, either on its own or through combining it with other factors that could eventually identify an individual.

We take steps to **raise awareness of and grow** our business and we achieve this through various growth strategies. When you book a call or send an email in response to an offer on our platform, we will collect your name and phone number or email address.

If you sign up to one of our discounts available on the website, we will collect your name and date of birth (so we can share birthday offers) and email

address so we can contact you.

**When you sign up to our newsletter, we will collect your name and email address.** The legal basis we rely on for this is Article 6(1)(a) of the GDPR - Consent.

- **Where do we store it?**

In our attempt to grow and expand our business we have partnered with various companies that help us with our user engagement and marketing strategies. These include our CRM and other tools analysing our advertising, social media engagement and customer contacts. We also use a platform to book calls or send emails in response to offers on our website

We use different data processors and suppliers to manage our services. If you are currently a user of ALTIDO and would like a list of where your data resides, please get in touch using the contact details below.

- **How long do we keep it for?**

We will retain your details until you choose to opt-out or unsubscribe. We will retain your details for our newsletter unless you unsubscribe, in line with our business needs.

- **When you apply for a job with us**

- **What personal data do we collect, why do we collect it, and what legal basis do we rely on?**

Personal data is anything that can identify an individual, either on its own or through combining it with other factors that could eventually identify an individual.

**When you apply for a job with us,** we need some information about you in order to manage your recruitment process, such as your name, CV, email address, phone number, interview notes and references from previous employers. The legal grounds we rely on for this processing are Article 6(1)(f) of the GDPR - Legitimate Interests.

- **Where do we store it?**


We make use of various job boards to advertise roles, and collect applications from them. We store CVs and corresponding notes on our internal drive. We use an application for the signing of contracts.

- **How long do we keep it for?**

We keep the personal data collected for unsuccessful applicants for up to 12 months.

- **When you visit our website**

Our website uses cookies and other similar technologies of which you should be aware.

-  **What cookies do we collect, why do we collect them, and what legal basis do we rely on?**

Cookies are text files placed on your hard drive by a web page server when you visit a website and are saved in your browser's history. They allow the website to recognise your device and store some information about your preferences or past actions. Cookies cannot be used to run programs or deliver viruses to your computer; they are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie.

When you use our website, the cookies that can be stored on your device are either **first party cookies**, which are placed and read by us directly while you are using our website or **third party cookies**, which are set by other third parties we have partnered with.

Below is a list of the cookies we use and the purposes for which they are used:

### **Essential cookies**

These are essential to the operation of our website and are integral to the functioning of our Website, therefore they cannot be removed.

<b>Name</b>	<b>Purpose</b>	<b>Provider</b>	<b>Duration</b>
bugsnag-anonymouse-id	This cookie is used to detect errors on the website – this information is sent to the website's support staff in order to optimize the visitor's experience on the website.	<a href="http://stayaltido.com/">http://stayaltido.com/</a> (HTTP)	Persistent

PHPSESSID	Preserves user session state across page requests.	<a href="http://altido.krossbookin.g.com">altido.krossbookin.g.com</a>	
(HTTP)	Session		
PHPSESSID	Preserves user session state across page requests	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	
(FTTP)	Session		
test_cookie	Used to check if the		
user's browser supports cookies	<a href="http://doubleclick.net/">http://doubleclick.net/</a>		
(HTTP)	1 day		

### Non-essential cookies

These cookies are additional to the the performance of our Website and help us improve the service we provide to you. They can be first party (added by us) or third party (added by one of our partners) cookies that enable us to monitor and analyse how visitors use our website and generate statistics based on them. They can also be used to allow us to track and analyse your response concerning web traffic or behaviour regarding changes to the structure, text or any other component of our Website.

### Preferences cookies

Preference cookies allow the website to memorize information that changes the behavior or appearance of the website, such as your preferred language or the region in which the User is located.

Name	Provider	Purpose	Expiry	Type
ss	<a href="http://va.tawk.to/">http://va.tawk.to/</a>	Necessary for the functionality of the website's chat-box function.	Session	HTTP

### Statistical cookies

Statistics cookies help website owners understand how visitors interact with the

website, collecting and disclosing information anonymously.

<b>Name</b>	<b>Provider</b>	<b>Purpose</b>	<b>Expiry</b>	<b>Type</b>
_ga	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	HTTP
ga#	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit.	2 years	HTTP
_gat	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Used by Google Analytics to throttle request rate	1 day	HTTP
_gid	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day	HTTP



<p>_hjAbsoluteSessionInProgress</p>	<p><a href="http://stayaltido.com/">http://stayaltido.com/</a></p>	<p>This cookie is used to count how many times a website has been visited by different visitors – this is done by assigning the visitor an ID, so the visitor does not get registered twice.</p>	<p>1 day</p>	<p>HTTP</p>
<p>_hjFirstSeen</p>	<p><a href="http://stayaltido.com/">http://stayaltido.com/</a></p>	<p>This cookie is used to determine if the visitor has visited the website before, or if it is a new visitor on the website.</p>	<p>1 day</p>	<p>HTTP</p>
<p>_hjIncludedInPageviewSample</p>	<p><a href="http://stayaltido.com/">http://stayaltido.com/</a></p>	<p>Used to detect whether the user navigation and interactions are included in the website’s data analytics.</p>	<p>1 day</p>	<p>HTTP</p>

_hjIncludedInSession Sample	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Registers data on visitors' website-behaviour. This is used for internal análisis and website optimization.	1 day	HTTP
_hjRecordingLastActivity	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Sets a unique ID for the sesión. This allows the website to obtain data on visitor behaviour for statistical purposes.	Session	HTML
hjSession#	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read.	1 day	HTTP

hjSessionUser#	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read.	1 year	HTTP
_hjTLDTest	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Session	HTTP
hjViewportId	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	Session	HTML
TawkConnectionTime	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Allows the website to recognise the visitor, in order to optimize the chat-box functionality.	Session	HTTP

## Marketing cookies

Marketing cookies are used to track visitors as they browse the website. The goal is to display ads that are relevant and appealing to the user.

Name	Provider	Purpose	Expiry	Type
_fbp	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months	HTTP
_gcl_au	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	2 years	HTTP
_hjRecordingEnabled	<a href="http://stayaltido.com/">http://stayaltido.com/</a>	This cookie is used to identify the visitor and optimize ad-relevance by collecting visitor data from multiple websites – this exchange of visitor data is normally provided by a third-party data-center or ad-exchange.	Session	HTML

Ads/ga-audiences	<a href="http://google.com/">http://google.com/</a>	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behavior across websites.	Session	Pixel
IDE	<a href="http://doubleclick.net/">http://doubleclick.net/</a>	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year	HTTP

Pagead/1p-user-list/#	<a href="http://google.com/">http://google.com/</a>	Tracks if the user has shown interest in specific products or events across multiple websites and detects how the user navigates between sites. This is used for measurement of advertisement efforts and facilitates payment of referral-fees between websites.	Session	Pixel
tr	<a href="http://facebook.com/">http://facebook.com/</a>	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	Session	Pixel

You can choose not to store **Non-essential cookies** on your computer when you visit our website, or you can adjust your browser settings to prevent cookies from being saved on your computer. You can find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- [Google Chrome.](#)
- [Mozilla Firefox.](#)
- [Apple Safari.](#)
- [Microsoft Internet Explorer.](#)
- [Microsoft Edge.](#)
- [Brave.](#)
- [Opera.](#)

When you first visit our website, you will be prompted to customise your cookies selection and be provided with a link to this policy, where you can find more information about the cookies we use.

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## What are your rights?

Your personal data is yours and you have rights in relation to it granted by the UK GDPR, which include:

- **The right to be informed**

You have the right to be informed about the collection and use of your personal data, the purposes for processing, retention periods for that personal data and who it will be shared with. We have set this information out in this privacy notice.

- **The right of access**

You have the right to ask us for copies of the data we hold about you. If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details).

- **The right to object**

You have the right to ask us to stop processing your personal information in some circumstances, such as when we are relying on our own (or someone else's) legitimate interests to process your personal information, when we are processing your personal information for direct marketing or when we are processing your personal information for research.

- **The right to rectification**

You have the right to ask us to rectify the personal information you think is inaccurate or to complete information you think is incomplete. When you ask us to rectify your information, if we've shared your personal information with others, we'll let them know about the rectification where possible.

- **The right to erasure**

You have the right to ask us to erase your personal information, in some circumstances, such as where we no longer need it or you withdraw your consent (where applicable).

- **The right to restrict processing**

You have the right to ask us to restrict the processing of your personal information

for a period of time in some circumstances, such as where you contest the accuracy of that personal information or object to us processing it. This right is separate from the right to object and will only stop us from using your personal information further, not from processing it. If we've shared your personal information with others, we'll let them know about the restriction where possible.

- **The right to data portability**

You have the right to ask that we transfer the personal information you gave us to another organisation, or to someone else, in some circumstances.

You don't have to pay anything in order to exercise your rights. Please contact us by sending an email to [privacy@stayaltido.com](mailto:privacy@stayaltido.com) if you wish to make a request under your rights; we have a calendar month to get back to you with a response.

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## Our contact details

If you have any concerns about our use of your personal information, please let us know by:

Emailing us at [privacy@stayaltido.com](mailto:privacy@stayaltido.com), or writing to us at ALTIDO Ltd, 26 Astwood Mews, London, SW7 4DE, UNITED KINGDOM

If you are not satisfied with our response or you are unhappy with how we have used your data, you can complain to a data protection authority. List of [EU data protection authorities is available here](#).

For the UK, the Information Commissioner's Office (ICO) contact details are below:

**ICO Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Helpline number: 0303 123 1113 **ICO Website:** <https://www.ico.org.uk>