

# PERSONAL DATA PROTECTION AND CONFIDENTIALITY POLICY

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## I. INTRODUCTION

1. Thank you for using Crete-Villas-Apartments! Your trust is important to us and we are committed to protecting the privacy and security of your personal information in accordance with [European Regulation 2016/679](#). The information provided by you, helps us to provide a better experience at Crete-Villas-Apartments (CVA).
2. This Privacy Policy describes how we collect, use, process and disclose your personal information, in conjunction with your access to and use of the CVA Platform.
3. Your consent to the use of cookies in accordance with the terms of our policy during your first visit to the website, allows us to use cookies every time you visit our website.

Για να δείτε αυτό το έγγραφο στα Ελληνικά, ακολουθήστε την παρακάτω διαδικασία:

1. Στην Σελίδα της Crete-Villas-Apartments επιλέξτε ως γλώσσα τα Ελληνικά από το κόκκινο μενού στο πάνω μέρος της σελίδας.
2. Όταν ξαναφορτώσει η σελίδα, στα Ελληνικά αυτή τη φορά, επιλέξτε πάλι να ανοίξετε την πολιτική απορρήτου και θα ανοίξει στα Ελληνικά.

## II. DEFINITIONS

If you see an unspecified term in this Privacy Policy (such as "Registration" or "CVA Platform"), it has the same definition as in the [Terms of Service](#) ("Terms").

## III. CREDITS

This document was created using a template by SEQ Legal ([seqlegal.com](http://seqlegal.com)) and modified by Crete-Villas-Apartments ([www.crete-villas-apartments.com](http://www.crete-villas-apartments.com))

## IV. COLLECTION OF PERSONAL INFORMATION

There are three general categories of information we collect.

### 1. Information you give us.

#### *1.1 Information required to use the CVA platform.*

We request and collect the following personal information when you use the CVA platform. This information is necessary for the adequate performance of the contract between us and for us to be able to comply with our legal obligations. Without this, we may not be able to provide you with all the required services.

- **Account information.** When you register, we need your email address.
- **Profile and registration information.** To use certain functionalities of the CVA platform (such as booking or creating an accommodation page), we may ask you to provide additional information, which may include your first name, last name, date of birth, residential address, telephone number or a profile picture, depending on what information we are forced to ask from the visitor who performing a reservation or from the owner that is getting paid, based on the currently applicable law.
- **Authentication information.** To create and maintain a trusted environment, we may collect authentication information (such as pictures of your identity card, passport, national identity card, or driver's license as permitted by applicable law) or other authentication information.
- **Payment Information.** In order to use certain features of the CVA platform (such as booking or registering an accommodation), we may require you to provide certain financial information (such as your bank account or credit card information) to enable payment processing.
- **Contact CVA and other Members.** When you contact CVA or use the Platform to communicate with other Members, we collect information about your communication and any information you choose to provide.

### *1.2 Information you choose to give us.*

You can give us additional personal information to get a better user experience when using the CVA platform. This additional information will be processed based on our legitimate interest or, as the case may be, your consent.

- **Additional profile information.** You can choose to provide additional information as part of your CVA profile (such as preferred language and city or region of residence). Some of this information, as mentioned in your account settings, is part of your public profile page and will be visible to others.

### *1.3 Information required for payments.*

The CVA must collect the following information necessary for the proper performance of the contract with you and comply with applicable law (such as anti-money laundering regulations). Without this, you will not be able to use the Payment Services:

- **Payment Information.** When using Payment Services, CVA requires specific financial information (such as your bank account or credit card information) to process payments and comply with applicable law.  
As owner of an accommodation, we will need to have a bank account to make the payment of your reservation. If there is not a bank account submitted until that moment, we will inform you. All information is transmitted encrypted through the network and also stored encrypted in our database.

- **Authentication and other information.** If you are a host, your CVA may require authentication information (such as pictures of your ID, passport, national identity or driver's license) or other authentication information, your date of birth, your address, email address, telephone number and other information to verify your identity, provide Payment Services and comply with applicable law.

#### *1.4 Information we collect automatically (from your use of the CVA platform and payment services).*

When you use the CVA Platform and Payment Services, we automatically collect personal information about the services you use and how you use them. This information is necessary for the adequate performance of the contract between us, to be able to comply with legal obligations and given our legitimate interest to be able to provide and improve the functions of the CVA platform and Payment Services.

- **Usage information.** In order to ensure the correct functionality of the platform and to correct eventual technical problems that may occur during your navigation, we collect information about your interactions with the CVA platform, such as the pages or content you view, your searches for listings, bookings and other actions on the CVA platform. When there are not any errors or the errors are resolved, those data collected are deleted at later, one month after their collection.
- **Log data and device information.** We automatically collect log data when you access and use the CVA platform, even if you have not created an account or are not logged in. This information includes, but is not limited to: details on how to use the CVA platform (including if you clicked links to third-party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique IDs, bug data, cookie data, and pages that you have seen or interacted with before or after using the CVA platform.
- **Cookies and similar technologies.** We may collect specific information through automated means using technologies such as cookies, browser analysis tools, server logs.

A cookie is a file that contains an identifier (a series of letters and numbers) that is sent through a server and stored in the browser. The ID is then sent back to the server each time the browser requests a page from the server. Cookies can be either "permanent" or "login" cookies: a persistent cookie is stored in a browser and remains valid until its expiration date, unless deleted earlier by the user, a login cookie on the other hand will expire at the end of the user login when the browser is closed. Cookies usually do not contain information that can identify the user but your personal data we hold may be linked to data stored or retrieved by cookies. The information we collect is used only on unrecognizable data without reference to personal data. For example, we may use the information we collect to better understand traffic patterns and optimize our site experience.

We do not currently use cookies (online or permanently) on our website to collect this information. When this happens you will be notified in a timely manner as well as

this privacy policy will be modified on the CVA website.

You can delete cookies if you choose. See about it here: [www.aboutcookies.org](http://www.aboutcookies.org). You can delete all cookies that are already on your computer, as well as configure most browsers to prevent the installation of cookies. If you choose to delete or remove certain cookies, the operation of our website may be affected.

- **Payment transaction information.** CVA collects information related to your payment transactions through the CVA platform, including the means of payment used, the date and time, the amount of payment, the expiration date and postal code, IBAN information, your address and other relevant transaction details. This information is necessary for the proper performance of the contract between you and the CVA and for enabling the provision of Payment Services.

### *1.5 Information we collect from third parties.*

If someone has written a review for you, it will be posted on the CVA public profile page with your consent.

To the extent permitted by applicable law and with your consent, where required, the CVA may use your information, including your full name and date of birth, to obtain reports from local authorities of infringements.

## 2. Child data

Our website and applications are not intended for children under the age of 18 and we do not knowingly collect personal information directly from children under the age of 18. If you believe that we are improperly processing the personal information of a child, we take it very seriously and urge you to contact us using the information provided in the "Contact Us" section below.

## **V. HOW WE USE THE INFORMATION WE COLLECT**

### 1. Provision, improvement and development of the CVA platform.

We may use your personal information to provide, improve and develop the CVA platform, as:

- Having access and use the CVA platform,
- Communicate with other members,
- Protect, improve and optimize the platform and its user experience, such as collecting statistics and conducting surveys,
- Provide customer service,
- Send support messages, updates, security alerts, and account alerts,

We process this personal information for these purposes, given our legitimate interest in improving the CVA platform and our members' experience with it, and where necessary for the proper performance of the contract with you.

## 2. Creating and maintaining a reliable and secure environment.

We may use personal information to create and maintain a trusted and secure environment such as:

- detecting and preventing fraud, spam, abuse, security incidents and other harmful activities;
- conducting safety investigations and risk assessments,
- verification or authentication of other information or identifications you have provided to us (such as verifying your residence address or comparing your identity photo with another photo you have provided);
- conducting checks on databases and other sources of information, including background checks or police data, to the extent permitted by applicable law and with your consent, where required;
- to comply with our legal obligations,
- for resolving any disputes with any of our Members and enforcing our agreements with third parties,
- to enforce our Terms of Service and other policies,

We process this personal information for these purposes, given our legitimate interest in protecting the CVA platform, in enforcing our contract with you and in complying with applicable laws.

## 3. Provide, personalize, measure and improve advertising and marketing.

We may use your personal information to provide, personalize, measure and improve advertising and marketing, such as:

- send promotional messages or other information you may be interested in based on your preferences (including information about the CVA Platform or promotions and services campaigns and social media advertising through social media platforms), or
- to participate in lotteries, contests or other promotional activities or events sponsored or managed by CVA

We will process your personal information for the purposes set out in this section, given our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

#### 4. How we use the personal information collected.

We may use personal information for the following reasons:

- Access and use the Payment Services.
- Detect and prevent fraud, abuse, security incidents and other harmful activities.
- Carrying out safety investigations and risk assessments.
- Carrying out checks against databases and other sources of information.
- Compliance with legal obligations (such as regulations against money laundering).
- To ensure the implementation of the Terms and other payment policies.
- With your consent, we can send you advertising messages, marketing, advertising and other information that may be of interest to you based on your preferences.

We process this personal information, given our legitimate interest in improving our services and our user experience with them, and where necessary, for the proper performance of the contract with you and for compliance with applicable laws.

#### 5. Your choices

You have options regarding the notifications we send you that are related to important information about your bookings, accommodation and activity on the CVA Platform.

You can update your settings and choose whether to receive these notifications on your mobile or email address.

Even if you opt out of email alerts, we may send you important alerts related to activity confirmations or fraud alerts.

## **VI. RECIPIENTS OF THE DATA**

#### 1. Notification between Members.

In order to facilitate bookings or any other interaction between Members, we may need to share certain information, including personal information, with other members, as is necessary for the proper performance of the contract between us:

- When you, as a Guest, request a booking, certain information is shared with the Host, including your profile, full name, full guest name, cancellation history, and other information that you agree to share. Once your booking is confirmed, we will disclose additional information (to the Host) to help you plan your trip, such as your phone number.

- When you as a Host have a confirmed booking, certain information is shared with the Guest to coordinate the booking, such as your profile, full name, phone number and residence address..

We do not share your billing and payment details with other Members.

## 2. Profiles, listings and other public information.

The CVA platform allows you to publish information, including personal information, to the general public. For example:

- Parts of your public profile page, such as your name, description, and city, are publicly visible to others.
- Registration pages are visible to the public and include information such as the exact, or approximate, location of the accommodation (neighborhood and city), listing description, calendar availability, your public profile photo, aggregate demand information (page views for a period of time) period) and any additional information you choose to share.
- Upon completion of the booking, Guests and Hosts can write reviews and rate each other. Reviews and ratings are part of your public profile page and may also appear elsewhere on the platform (such as on the listing page).

Based on our legitimate interest in promoting the CVA platform, we may display portions of the platform (eg your listing page) on sites managed by our business partners using technologies such as widgets or APIs.

The information you share publicly on the CVA platform may be indexed by third party search engines (Google). If you change your settings or the content you see in the audience, these search engines may not update their databases. We do not control the practices of third party search engines.

## 3. Additional services from Hosts.

Hosts may need to use third party services available through the CVA platform to assist in managing their accommodation. Hosts can use the tools provided by the CVA Platform to share visitor information (such as check-in and check-out dates) with third party service providers to coordinate accommodation, stay management or other services. Hosts are responsible for the third party service providers who use and guarantee that these providers process visitor information securely and in accordance with applicable law, including privacy and other data protection laws.

#### 4. Service providers.

We use third party services to provide services related to the Platform. Service providers may be located inside or outside the European Economic Area ("EEA"). Specifically, our service providers are based in Europe and North America.

For example, service providers can help us with: (i) sending cell phone messages, (ii) verifying your identity or checking your identity documents, (iii) conducting history or police checks, fraud prevention and risk assessment, (iv) provision of kilometers of driving distance between the coordinates of the Registrations, (v) provision of advertising services. These providers have limited or no access to your personal information to perform these tasks on our behalf.

#### 5. Compliance with the law.

Payments may disclose your information, including personal information, to courts, law enforcement, government, tax authorities or authorized third parties, to the extent required or permitted by law, if such disclosure is reasonably necessary for : (i) comply with our legal obligations, (ii) comply with a valid legal claim or respond to claims filed against the CVA, (iii) respond to a valid legal claim related to a criminal investigation or alleged or suspicious illegal activity or any other activity that may expose us, you or any of our users to legal liability, (iv) for the enforcement and management of the Terms of Service or other agreements, or (v) for the protection of rights, property or personal security of the Platform, its employees or its Members. For example, if permitted due to pending circumstances, the host's tax information may be disclosed to tax authorities or other government agencies.

These disclosures may be necessary to comply with our legal obligations and to defend our legal rights, to protect your own or another person's interests, to facilitate the collection of taxes and the prevention of tax fraud, or to prevent damage.

Hosts and Visitors, where legally permitted under applicable law, expressly authorize us, without further notice, to disclose host and visitor data and other information related to or about them, their transactions, bookings, residence taxes and completeness of registration with the competent tax authority, including, for example, the name of the Host or Guest, registration addresses, transaction dates and amounts, the amount of taxes received (or due) by the hosts from visitors and contact details.

CVA may require registration or licensing of the accommodation listed on the CVA Platform by the Host in accordance with applicable law. We may disclose information about Hosts to the competent authority, both during the license application process and, where appropriate, periodically thereafter, such as the full name and contact details of the host, accommodation address, tax registration number, registration details and number of nights.

## 6. Data transfer.

If CVA is involved or is suspected of any mergers, acquisitions, asset sales, bankruptcies, or other insolvency events, then we may sell, transfer, or share some or all of our assets, including your information. In this case, we will notify you before the transfer of your personal information.

## 7. Aggregate data.

We may also disclose aggregate information, which is designed not to identify an individual user, or other anonymous information, for regulatory compliance, industry and market analysis, research, demographics, marketing, advertising, and other business purposes.

# **VII. OTHER IMPORTANT INFORMATION**

## 1. Analysis of your communications.

We may monitor or analyze your communications through the CVA platform for fraud prevention, risk assessment, compliance, research, product development, analytics and customer support purposes. For example, as part of our fraud prevention efforts, we analyze messages to cover contact information and referrals to other sites. In some cases, we may also check or analyze messages to debug, improve, and extend product offerings. We use automated methods where possible. However, from time to time we may need to manually monitor certain communications, such as fraud investigations and customer support, or to evaluate and improve the functionality of these automated tools. We will not scan, scan or analyze messaging communications to send you third party marketing messages and we will not sell reviews or analyzes of these communications.

These activities are based on CVA's legitimate interest in complying with our applicable laws and Terms, fraud prevention, promoting security and improving and ensuring the proper performance of our services.

## 2. Partners and third parties

The CVA platform may contain links to third party websites or services. CVA does not own or control these companies and when you interact with them, you may provide information directly to them, CVA or both. These companies will have their own rules regarding the collection, and use of personal information. We encourage you to read the privacy policies of the other sites you visit.

Parts of the CVA platform may use third-party services, such as Open Street Maps and other. Use of these services is subject to their privacy policies.

The personal information you post on our site or submit for publication on our site may be available online worldwide. We cannot prevent the use or misuse of such information by third parties.

## VIII. YOUR RIGHTS

### 1. Right to update, correct and access own data

According to the current legislation, you can ask us to give you, any information we keep from the contact page. We may ask you to verify your identity and your request before taking any further action on your request. We may withhold the personal information you request for the period permitted by law.

As a Member you have access to and can update your information at any time through your account settings on the CVA Platform.

In practice, you will usually either explicitly agree in advance to the use of your personal information for advertising purposes, or we will give you the opportunity to exclude your information from the use for advertising purposes.

Please let us know if the information we have about you needs updating or correction.

### 2. Right to object to processing

You can ask us at any time not to process your personal information for advertising purposes.

### 3. Right to oblivion

We generally retain your personal information for as long as necessary for the performance of the contract between us and to comply with our legal obligations.

You can request the deletion of all your personal information. Please note that if you request the deletion of your personal information:

- We may retain some of your personal information as required by our legitimate business interests, such as detecting and preventing fraud and enhancing security. For example, if we suspend a CVA account for fraud or security reasons, we may retain some information from that account to prevent that member from opening a new account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, CVA may retain some of your information on tax, legal and audit obligations.

- Any reviews you have made on other Members may still be publicly visible on the Platform, even after your account has been canceled. However, the retrieval of such information to you will be terminated. Additionally, some copies of your information (eg logs) may remain in our database but are disconnected from your personal IDs.
- Because we keep and protect our data from accidental or malicious loss and destruction, some remaining copies of your personal information may not be removed from our backup systems for a limited period of time.

#### 4. Right to portability,

You have the right to request that the data relating to you be received in a structured, commonly used and machine-readable format, and that such data to be transmitted to another processor.

## **IX. PERSONAL DATA SECURITY**

We are constantly creating and updating technical and physical security measures to protect your information from unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption and information access controls.

To browse our site, we use secure connection and data security measures to prevent the risk of loss, misuse, unauthorized access and disclosure of your personal information. All electronic money transactions on our site are protected by our encryption technology.

You acknowledge that the transmission of information over the Internet is inherently insecure and that we cannot guarantee the security of data transmitted over the Internet.

You are responsible for maintaining the confidentiality of the password you use, we will not ask for your password (unless you log in to our site).

If you know or have reason to believe that your account credentials have been lost, stolen, misappropriated or tampered with, or in the event of any actual or suspected unauthorized use of your account, please contact us as described in the Contact section..

## **X. AMENDMENTS**

CVA reserves the right to modify this Privacy Policy at any time in accordance with this provision. You should check the page from time to time to make sure you understand any changes to our policy. If we make changes we will post the revised version on the CVA Platform and update the "Last Updated" date at the top of the Policy. We will also notify you of the modification via email before their effective date. If you disagree with the revised Privacy Policy, you may cancel your

Account. If you do not cancel your account before the revised Privacy Policy expires, continued access to or use of the CVA Platform is subject to the revised Privacy Policy.

## **XI. CONTACT**

If you have any questions or concerns about this Privacy Policy or CVA information handling practices or feel that your privacy rights are being violated, please email us at: [contact@crete-villas-apartments.com](mailto:contact@crete-villas-apartments.com)

If the issue is not resolved, you can upload it to the European Commission's electronic dispute resolution platform. You will find it here:  
<https://ec.europa.eu/consumers/odr/main/index.cfm?event=main.home2.show&lng=EL>