

Last updated: 4 July 2017

We are serious about protecting the privacy of our users. This Privacy Policy describes how we use and protect your personal information. It applies to www.ownersdirect.co.uk and to any other affiliate website where this policy is linked to in the footer of the page (collectively referred to as the “Site”), and any mobile application of such websites. Websites of our affiliates may be governed by separate privacy policies and those policies are generally accessible by links in the footers of those websites.

The Site is operated by the HomeAway group of companies, which is part of Expedia, Inc group. You can find details of the HomeAway group on the Site and where we refer to all of these companies, including our parent company and its subsidiaries and affiliates; in this Privacy Policy we call them the “HomeAway Group”.

The terms “**users**” or “**you**” as used in this Privacy Policy, refer to travellers, who use the Site to look for properties to rent (“**Travellers**”), to property owners, lessees and property managers (“**Owners**”) who list their properties for rent on the Site, and to other users who use software or other tools or services we provide on the Site.

We use information collected about you only as permitted in this Privacy Policy. The Site may contain links to third parties’ websites. We are not responsible for the privacy practices or the content of those websites. The Site may also contain links to terms and conditions and privacy policies of third party providers who provide tools or services on the Site. Therefore, please read carefully any privacy policies on those links or websites before either agreeing to their terms or using those websites. Unless we explain otherwise in this policy, the words and phrases used in this policy have the same meaning as in the [Owner Terms and Conditions](#) and the [Traveller Terms and Conditions](#).

By providing information to us when listing a property, searching for a property, using any tool or service on the Site, posting any content, sending inquiries or otherwise using the Site, you agree to this Privacy Policy. This Privacy Policy was last updated on the date set forth above and applies from that date. We may occasionally amend this Privacy Policy to reflect regulatory requirements, advances in technology, Site updates and changes in our information collection and disclosure practices. Any new policy will automatically be effective when it is published on the website. You should therefore return here regularly to view our most up to date Privacy Policy. You should also print a copy for your records.

The Site is intended for use by individuals who are over 18 years of age.

Who processes your personal information, and where?

Information that can identify you ("personal information") will be collected, processed, stored and used by us, and passed to and processed by companies in the HomeAway Group (our parent company Expedia, Inc and its affiliates) and other data processors acting under our instructions or those of one of the companies in the HomeAway Group. These people may be engaged in,

among other things, the fulfilment of your information requests and the provision of support tools and services on the Site. They may also be helping us maintain the integrity and security of the Site, including emails and messaging platforms on the Site. As a result, personal information contributed by or collected from users may be stored and processed in the United Kingdom, United States or any other country in which we, our parent company, our or their affiliates, subsidiaries, partners or agents maintain facilities. The data protection and other laws of the United States and other countries that your data may be transferred to might not be as comprehensive as those in your country, but please be assured that we take steps to ensure that your privacy is protected. By using our services, you understand that your personal information may be transferred to our facilities and those third parties with whom we share it as described in this Privacy Policy.

We may also periodically obtain both personal and non-personal information about you from affiliated entities, business partners and other independent third-party sources and add it to our account information. Examples of information we may receive include travel history and demographic information. By submitting your personal information, you agree to this collection, transfer, storing and/or processing.

Where you use HomeAway's services to connect with other people (for example, if you use the HomeAway network to communicate with Travellers who may wish to rent your property) that communication will also be accessible to us and will be covered by this policy.

Our Site may also collect and store some information (including personal information) locally on your device using your browser and data caches. This could include, for example, photographs of properties you have viewed online.

Please also remember that when you share information on the Site, it may be "indexable" by search engines, including Google, which may mean that the information is made public. For example, if you review a property you have stayed at, the review and any information you provide as part of that review may be publicly accessible (including on other websites).

HomeAway Group sites may also use Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in our Cookies Policy and in Google's own privacy policy. Google may aggregate data they collect from their various services including Google Analytics, Google Translate, Google Maps and YouTube. You acknowledge and accept that HomeAway Group has no control over Google's data collection. We strongly advise that you look at Google's privacy policy for details of their data collection practices.

The information we collect

At various times you may give information to us. This includes information that can identify you, including your first and last name, telephone number, postal and email addresses, fax number, and credit card information. For example, in order to send a request or enquiry from a Traveller to an Owner, we may need to know all or some of the following: your full name, address, telephone number, e-mail address, your current location, and, in the case of an Owner's listing, a method of payment. You may also give personal information to us at other times, such

as when registering on the Site, when submitting an advertisement for a property or communicating with another user of the Site.

When you use the Site we may collect and process information about your actual location, including GPS signals sent by a mobile device. We may also use various technologies to determine location, such as sensor or IP address data from your device.

If you make or use social media features on the Site, the social media provider may send us information in line with their policies. That information may include personal information such as your name, profile picture, gender, friend lists and any other information you have chosen to make available. Please note that, if you have friends using social media who are using the Site, they may also have shared information about you with us through the social media platform. If you wish to prevent that sharing, you can do so by editing the settings/preferences in your account with the relevant social media providers.

We may also gather information from cookies, web beacons or similar technologies from the internet. You can find out more about how we do that in the relevant section of this policy below and in our [Cookies Policy](#). We use publicly accessible information to verify information we are provided with and to manage and expand HomeAway's business. We also collect IP addresses, mobile device identifier details, your location, navigation and click-stream data, the time of accessing the website, properties you viewed, what you searched for, the duration of your visit, and other details of your activity on the internet. If you ask us to connect with other sites (for example if you ask us to connect with your Facebook account) we may get information that way too. In connection with electronic communications we facilitate through a Site, we use electronic or manual checks to monitor such communications for trust and security purposes. For further details on how we collect personal information, see Surveys and Newsletters below. We obtain data from you either by you inputting your personal details, by the automatic collection of information about you as you use the Site, when we speak to you, or from third parties or websites. Third party information may include financial information which we use to prevent and detect fraud, information from your mobile provider if you are accessing the Site over a mobile device or information from a third party such as a social media or travel opinions site.

We may collect reviews written by Travellers on a property they have stayed in ("Traveller Review") and/or written by Owners on a Traveller's stay ("Owner Reviews"). Traveller Reviews are displayed on our Site, while Owner Reviews will only be disclosed to Owners who receive an inquiry or booking request from that Traveller. Owner Reviews enable an Owner to know more about the Traveller who has contacted them and therefore increase trust in our platform. Owners must comply with the [Owner Terms and Conditions](#) and applicable law and this includes not using any information about a Traveller to discriminate against such Traveller.

How we use your personal information

Our primary purpose in collecting your personal information is to provide you with the services you requested and those which we believe will optimise your use of the Site. We may use your personal information for the following purposes:

- For the services or support you request;
- To contact you from time to time with critical user or service updates;
- To send other messages that are useful to the service we provide on the Site;
- To assist people you have done (or agreed to do) business with. For example if you are an Owner and a Traveller who has booked or enquired with you needs your details we may pass them on; if you are a Traveller and an Owner you have booked with needs to contact you we may give them your details;
- To provide personalised, targeted, or location-based content, services, and advertising from us and third parties;
- If necessary, to measure your interest in and improve our products, services and the Site;
- To promote the services related to the Site or those of the HomeAway Group, our parent company and its affiliates and/or our affiliates by email and via social media platforms;
- To compare information for accuracy, and verify it with third parties;
- To provide information and statistics on the responsiveness of owners to enquiries on the Site, to improve Travellers' experience;
- To detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our Terms or any other purpose referenced herein or therein. We collate statistics about site traffic, sales and other commercial information which we pass onto third parties to assist us in improving the services we provide to you. We also use demographic information to tailor the Site and we share that information with third parties so that they can build up a better picture of our customer base and general consumer trends; and
- To help us meet our legal and compliance obligations – for example we may use personal information we hold on you to do background checks, to screen prospective Owners against official lists in the UK and overseas and to do credit checks.

How We May Disclose Your Personal Information

We may disclose your personal information to enforce our policies, defend and protect the rights, property or safety of the HomeAway Group, the Site and the users of the Site, to comply with our legal obligations or in the interest of national security, public interest or law enforcement in any country where the HomeAway Group has entities or affiliates. For example, we may respond to a valid request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, people and other rights or interests.

We share your information with third parties who help deliver our products and services to you. Examples include third parties who are hosting our web servers, analysing data, providing marketing assistance, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that data for any other purpose.

We may also share your personal information with:

- if you opt in to receive information about the opportunities, products, or services of third parties, we supply your contact information to those third parties so they may contact you;

- When creating a profile on our Site, the information in your profile will be available to be viewed by other Users of our Site.
- We will display your name (taken from your profile) with any content that you contribute to the Site (including an Owners description of a property, an Owners review of a Traveller or an Owners response to a Traveller review and a Traveller's review of a property, forum posts or any other content submitted by a User).
- An Owner if you send them an enquiry through the Site;
- An Owner, if you make what we consider to be a complaint either online via our website or by email to us, provided that we will first contact you by email to: (i) confirm receipt of your complaint; and (ii) ask you to notify us within 48 hours of us sending you the email if you object to us sending the complaint and your name to the Owner. If you do not object within 48 hours we will send your complaint and name to the Owner;
- An Owner, if you make what we consider to be a complaint by telephone and you agree to your complaint and name being shared with the Owner;
- Another user if you have done or may do business with them;
- We may display statistics of usage, such as information related to the responsiveness of owners, in the listings;
- Companies in the HomeAway Group and/or affiliates;
- Other companies we work with to feature all or part of our Owners' property listings or otherwise provide promotional or other services related to our or HomeAway Group's business. This might include featuring your listings and photographs on other websites; or
- Any third party you have asked us to share your personal data with – such as Facebook if you have asked us to connect with your Facebook account.

You may have accessed our website through a hyperlink from the website of one of our trading partners. If so, you consent to your personal details and purchase information including behavioural patterns being shared with that trading partner in accordance with our contractual relationship with them.

If any part of the HomeAway Group is sold, or some of its assets transferred to a third party, your personal information may also be transferred. Potential purchasers and their advisors may have access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy. Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration. Our Owner, Traveller and user database could be sold separately from the rest of the business, in whole or in a number of parts. It could be that the purchaser's business is different from ours too.

We may also share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors our websites. This information does not contain any personal information and is used to develop content and services we hope you will find of interest and to audit the efficacy of our advertising.

Newsletters

If you sign up as an Owner on the Site, you will receive our "Owner" newsletter, which is an integral part of the services we provide. Travellers that use the Site to send enquiries or who register with us will receive our newsletter. We and HomeAway group may offer different newsletters from time to time intended to enhance the services we or they offer. Users may cancel their subscription to these email newsletters at any time through the [Communications Preference Centre](#), although it may take a short while for the changes in your preferences to become effective.

Surveys

We may use surveys to gather information about our users. From time to time, we request users' input in order to evaluate potential features and services. The decision to answer a survey is completely yours. We use information gathered from surveys to improve our services.

Games

From time to time we may provide games on the Site. These games may allow for connectivity with other users or third parties. If that is the case you consent to your personal information being transferred accordingly.

Mobile Applications

When you download or use apps relating to our websites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalised content. Most mobile devices allow you to turn off location services. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

Telephone Calls

As well as collecting data online and from correspondence we may also speak with you face to face (for example at an Owner's meeting) or by telephone. We frequently record telephone conversations for quality assurance and training purposes. Those recordings are also governed by this Privacy Policy and we keep this data in the same way that we keep other data. Recordings of calls may also be transferred to locations or processed worldwide.

Enquiries and other Electronic Communications

Travellers may send enquiries to Owners via a Site, and Travellers and Owners may also communicate further with each other via tools on a Site.

If you choose to send an enquiry to an Owner on a Site, your personal information, including your email address and any other information you supply will be visible to the relevant Owner so that they can reply directly to you. Enquiries sent using the HomeAway system are also available

for review by our employees, agents and representatives, who may use any such information as part of the services we provide.

If Travellers and Owners further engage in communications through a Site, we also have access to those communications, which we may monitor for trust and security purposes and in order to provide services.

If you engage in such communications and call the other party, you may be asked to leave a return telephone number. Do not share information in the e-mail or phone call that you are not prepared to allow such person and HomeAway group to have, including, but not limited to, credit card and bank account information. Before disclosing any credit card or bank details or making any payments, please take the time to visit our [Community Pages](#) where you can find more details about phishing and how to reduce your risk.

We may also from time to time, use third party e-mail servers to send and track receipt of such communications, and analyse the pattern of such communications for trust and security purposes as well as to gather data, such as enquiry and booking data (on an anonymous basis), to assist us in better understanding our business. Our system does not hold messages indefinitely and they may not be accessible after the message has been delivered to you. ***Please therefore print a copy of any message which is important to you*** – for example a payment receipt or a booking confirmation.

How Do We Protect Your Personal Information Once We Have It?

We take appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal information and against accidental loss or destruction of, or damage to, your personal information. While no system is completely secure, we believe the measures implemented by the Site reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect our user database and access to this database is restricted internally. However, it remains each user's responsibility:

- To protect against unauthorised access to your user account;
- To ensure no-one else uses the Site while the user's device is logged on to the Site (including by logging on to your device through a mobile, Wi-Fi or share access connection you are using);
- To log off or exit the Site when not using it;
- Where relevant, to keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network. You should use a password which is unique to your use of the Site – do not use the same password as you use for another site or email account; and
- To maintain good internet security and avoid security threats. For example if your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts.

If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected.

Note that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result others may nevertheless unlawfully intercept or access private transmissions or data.

External Links and social plug-ins

If any part of the Site links you to other websites, those websites do not operate under this Privacy Policy. We recommend you examine the privacy policies posted on those other websites to understand their procedures for collecting, using and disclosing personal information.

This may also be the case when any part of the Site uses social plug-ins from other sites such as Facebook. Plug-ins such as Facebook's "Like" button, "Comments" and "Facebook Connect", can be identified by one of Facebook's logos, such as the "f" or "thumbs-up" icon, and in practice are like a little piece of Facebook embedded on the Site. (The list of Facebook social plug-ins and their icons can be found [here](#)). We also offer the option to register with our Site via the "Facebook Connect" Plug-in, which allows registered users of Facebook to register with our Site by using their Facebook account data without entering the required data manually on our webpage. Instead, your email address and Facebook ID will be transferred from Facebook to us and stored by us. When you land on any web page that uses these plug-ins, your browser sends certain information to Facebook. As with other websites that use these plug-ins, we do not control this data exchange. To learn more about the information that Facebook receives when you visit a web page with one of their plug-ins, we recommend that you visit Facebook's [help centre page](#).

What are Cookies, Web Beacons and Clear GIFs and Why Do We Use Them?

A "cookie" is a small file placed on your hard drive by certain of our web pages. We or third parties authorised by us may use cookies to help us analyse our web page flow, customise our services, content and advertising, measure promotional effectiveness and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them here at our Site.

Our Site has a dedicated section on cookies which you can read [here](#).

You may delete and block all cookies from this site, but parts of the site will not work. We want to be open about our cookie use. Even if you are only browsing the Site certain information (including computer and connection information, browser type and version, operating system

and platform details and the time of accessing the Site) is automatically collected about you. This information will be collected every time you access the Site and it will be used for the purposes outlined in this Privacy Policy.

You can reduce the information cookies collect from your device. An easy way of doing this is often to change the settings in your browser. Our cookies policy tells you how to do that. If you do that you should know that (a) your use of the Site may be adversely affected (and possibly entirely prevented), (b) your experience of this and other sites that use cookies to enhance or personalise your experience may be adversely affected, and (c) you may not be presented with advertising that reflects the way that you use our, and other, sites. You find out how to make these changes to your browser at this [site](#). Unless you have adjusted your browser setting so that it will refuse cookies, our system will send cookies as soon as you visit our site. By using the site you consent to this, unless you change your browser settings.

We gather and share information concerning the usage of the Site by Owners and Travellers with one or more third-party tracking companies for the purpose of reporting statistics. In this connection, some of the pages you visit on our Site use electronic images placed in the web page code, called pixel tags (also called a "clear GIFs" or "Web Beacons") that can serve many of the same purposes as cookies. Please [click here](#) to see the cookies we use when you browse our site.

Web beacons may be used to track the traffic patterns of users from one page to another in order to maximise web traffic flow. Our third-party advertising service providers may also use Web Beacons to recognise you when you visit the Site and to help determine how you found the Site. If you would like more information about this practice and to know your choices about not having this information used by these companies, click [here](#).

Display of tailored advertising/Your choices

The advertisements you see on this website are served by us or by our service providers. But we also allow third parties to collect information about your online activities through cookies and other technologies. These third parties include (1) other HomeAway Group companies and/or affiliates; (2) business partners, who collect information when you view or interact with one of their advertisements on our sites; and (3) advertising networks, which collect information about your interests when you view or interact with one of the advertisements they place on many different websites on the Internet. The information gathered by these third parties is used to make predictions about your characteristics, interests or preferences and to display advertisements on our sites and across the Internet tailored to your apparent interests. We do not permit these third parties to collect personal information about you (such as email address) on the Site, nor do we share with them any personal information about you.

Please note that we do not have access to or control over cookies or other technologies these third parties may use to collect information about your interests, and the information practices of these third parties are not covered by this Privacy Policy. Some of these companies may be members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please click [here](#) and [here](#).

Like other companies operating online, this site participates in cookie-based exchanges where anonymous information is collected about your browsing behaviour through cookies and other technologies and segmented into different topics of interest (such as travel). These topics of interest are then shared with third parties, including advertisers and ad networks, so they can tailor advertisements to your apparent interests. We do not share personal information (such as your email address) with these companies and we do not permit these companies to collect any such information about you on our site. Please click [here](#) to learn more about cookie-based exchanges, including how to access information about the topics of interest associated with cookies on your computer and how to decline participation in these programs.

How do I correct or update my information?

We allow our users the option to change or modify information previously provided. This may be done by sending the request to us at [Customer Support](#) or by updating the relevant details in your account.

How do I opt-out of receiving marketing communications from you?

You may opt-out of receiving marketing communications from us by the following means:

1. Contact us at [Customer Support](#);
2. Follow the instructions included in each communication or newsletter;
3. Use the [Unsubscribe function](#); or
4. Mail the request to us at:

Owners Direct, Attn: General Manager, Portland House, 25th floor, Bressenden Place, London, SW1E 5BH, United Kingdom

Please remember that if you change your preference it may take a short time for those preferences to become effective.

How long will we keep your personal information?

We will retain your personal information for as long as is necessary for the purposes to which you consent under the Terms and Conditions and this Privacy Policy, or as is required by applicable law, and may then retain certain information associated with your account, including for analytical purposes as well as record keeping integrity.

How do I contact you?

If you have any questions about this Privacy Policy, the practices of this Site, or your dealings with this Site, we encourage you to contact us at [Customer Support](#).

If you are unhappy with their answers you can also contact our UK Privacy Officer at privacy@homeaway.co.uk.

The data controller for any personal information you provide to us through this Site is HomeAway UK Limited of 25th Floor, Portland House, Bressenden Place, London, SW1E 5BH

You may also write to Expedia, Inc. , c/o PO Box 725, Belfast.BT1 3YL

Use the free [JavaScript beautify online](#) program can optimize the JS code.