

Privacy & Cookie Policy Template

Effective Date: 03/02/2026

1. Introduction

SOHA MANAGEMENT LTD ("**the Company**", "**we**", "**our**", or "**us**") respects your privacy and is committed to protecting your personal data. This privacy and cookie policy outlines how we collect, use, disclose, and protect your personal data when you interact with us, whether through our website, booking platforms, emails, phone, or during your stay in our properties.

We are registered in United Kingdom and our office is located at: **71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ**

Company Name: SOHA MANAGEMENT LTD (17009891)

Registered Address: 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

Email: info@soha.org.uk

We are registered as a Data Controller with Information Commissioner's Office (ICO)

ZC183706 and comply with all applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025

2. What Information We Collect

We collect personal data directly from you and automatically when you interact with us.

2.1 Personal Information You Provide

- Full name
- Contact details (email address, phone number, home address)
- Government-issued identification (e.g., passport or driver's licence)
- Payment information (processed securely by third-party platforms)
- Employer information (for business bookings)
- Guest information (names of other guests over 18)
- Booking preferences, special requests, and accessibility needs
- Communication records (emails, phone calls, messages)

2.2 Automatically Collected Data

- IP address
- Browser type, device type, and operating system
- Referral source, pages visited, time spent on site
- Cookies and usage data (see Section 10)

3. Legal Basis for Processing

We process your data under the following lawful bases:

- **Contractual necessity:** To manage and fulfil your booking
- **Legal obligation:** To comply with regulatory requirements
- **Legitimate interests:** Service improvement, fraud prevention, guest safety
- **Consent:** Marketing communications, newsletters

4. How We Use Your Information

We use your personal data to:

- Confirm and manage bookings
- Send check-in instructions and access details
- Verify identity and age
- Communicate before, during, and after stays
- Provide customer support
- Personalise guest experience
- Process payments and send invoices
- Conduct analytics and improve services
- Fulfil legal and accounting obligations
- Send marketing materials (if opted in)

5. How We Share Your Data

We never sell your personal information. We may share data with:

- **Internal teams:** Operations, guest services, property management
- **Third-party providers:**
e.g., payment processors (STRIPE, Management Software, OTA Platforms), **booking engines (booking platforms and property management systems, including Airbnb, Booking.com and Zeevou)**, automation tools (property management, guest communication, check-in, pricing and operational software providers), maintenance and cleaning teams
- **Regulatory bodies:** If legally required HM Revenue & Customs (HMRC), the Information Commissioner's Office (ICO), law enforcement agencies and other competent authorities
- **Property owners:** Where we manage units on behalf of landlords (only relevant booking and ID information)

All processors are contractually obligated to protect your data and only use it for specified purposes.

6. Data Retention

We retain data only as long as necessary:

- **Booking & financial data:** 6 years (for accounting/tax compliance)
- **Guest communications & check-in forms:** generally retained for up to 3 years after the end of the stay, unless a longer period is required for legal, accounting, fraud prevention or dispute-resolution purposes.
- **Marketing consent:** Retained until you unsubscribe

Data is securely deleted or anonymised after the retention period.

7. Your Data Protection Rights

You have the following rights under relevant data protection laws:

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object (including marketing)
- Right to data portability

To exercise your rights, contact us at: **info@soha.org.uk**
We respond within the legally required timeframe.

8. Data Security

Security measures include:

- SSL encryption
- Secure third-party payment processors
- Role-based staff access
- Data minimisation
- Regular reviews of data handling

No system is entirely secure; data is shared at your own risk.

9. International Transfers

Where data is transferred outside the United Kingdom (e.g., via cloud providers), we ensure safeguards such as:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Certified international compliance frameworks

10. Cookie Policy

Cookies are small text files stored on your browser to enhance your experience.

We use cookies to:

- Enable essential website functionality
- Analyse usage (e.g. Analyse website usage and performance through analytics tools)
- Remember user preferences
- Measure marketing effectiveness

Types of cookies used:

- Necessary
- Performance
- Functionality
- Marketing

You can manage cookies in your browser settings. More information at:
www.allaboutcookies.org

11. Children's Privacy

We do not knowingly collect personal data from individuals under 18. When a booking involves minors, we may ask for ages but do not collect identifiable information about children.

12. Marketing Communications

If opted in, we may send updates about:

- Promotions
- New properties
- Local partnerships
- Company news

You may opt out at any time via **unsubscribe** or by contacting **info@soha.org.uk**

13. Changes to This Policy

We may update this policy periodically. The latest version will always be available on our website and include the updated **Effective Date**.

14. Contact Us

For questions or concerns, contact:

Company Name: SOHA MANAGEMENT LTD

Address: 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

Email: INFO@SOHA.ORG.UK

Website: <https://www.soha.org.uk/>

If you are dissatisfied, you may contact the relevant data protection authority: Information Commissioner's Office ICO

