

Privacy Policy

Cotereh Corporation and its holdings, St. Bernard's Hill House, ("we", "us", "our" or the "Company") is committed to protecting your privacy. We recognize that privacy is an important issue, so this privacy policy outlines how we collect, use and protect the information of our guests when they interact with our website, booking system or stay at our property.

This Privacy Policy applies to www.stbernardshillhouse.com and the Company's treatment of your personally identifiable information ("Personal Information") and other data that we gather when you are accessing the website and/or participate in booking a stay at our property. If you do not agree to this Privacy Policy, please do not use the website.

By providing the information requested or by continuing to use the website after having an opportunity to review the Privacy Policy, you have consented to the terms of the Privacy Policy, and the Company's use of the information it collects as described at the point of collection or in this Privacy Policy. If you do not agree to the Privacy Policy, you may not use the website.

Cookies

Upon your first visit to our website, a cookie is sent to your computer that uniquely identifies your browser. A "cookie" is a small file containing a string of characters that is sent to your computer when you visit a website. We use cookies to improve the quality of our service and to better understand how people interact with us. The Company does this by storing user preferences in cookies and by tracking user trends and patterns of how people search. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some of our website features or services may not function properly without cookies.

Analytics Cookies

We may use analytics cookies to track information on how our website is used so that we can make improvements. We may also use analytics cookies to test new advertisements, pages, features or new functionality of our website to see how our users react to them. In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of our website, deliver advertisements on and through our website, and so on.

Information Collected

We collect information that your browser makes available whenever you visit a website. This log information includes your Internet Protocol address, browser type, browser language, the date and time of your query, session navigation and activity data, and one or more cookies that may uniquely identify your browser. We use this information to operate, develop and improve our Guest Experience, Customer Service and other products.

Personal Details: Contact Information (email, phone number), Address, Passport Details. Additional personal preference information may be required depending on the type of Guest Experience being booked.

Booking Information: Arrival/Departure dates, Room Configuration Preferences, Special Requests, Meals Preferences, Activity Preferences.

Payment Information: Currently, only bank wires are accepted as payment, therefore, Bank Details are requested at time of initial booking.

How Information Is Used

Booking Management: To process reservations, manage guest stays and communicate important details.

Customer Service: To respond to inquiries, address concerns, and provide personalized service. Additionally, we provide a Guest Satisfaction Survey so that guests can share appreciation or concerns.

Marketing and Promotions: To send occasional newsletters and offers using Mailchimp (with opt-out option).

Guest Reviews: Guests are encouraged to share their appreciation on Google Reviews. Additionally guest appreciation will at times be posted on our website with limited identifying information unless otherwise requested.

Compliance: To comply with legal and regulatory requirements.

Data Retention Policy

1. How Long We Keep Your Information. We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected and to comply with applicable laws. Specific retention periods include but are not limited to the following:

Booking and Guest Stay Information

- Reservation details and guest stay history: 7 years from last stay
- Payment information: 7 years (for tax and accounting purposes)
- Special requests and preferences: 5 years from last stay
- Pre-arrival questionnaires: 2 years from stay date

Marketing and Communications

- Marketing preferences: Until you opt-out or 3 years after last interaction
- Newsletter subscription data: Until you unsubscribe
- Email communications: 3 years from last correspondence

Account Information

- Inactive accounts: Archived after 3 years of inactivity
- Deleted accounts: Permanently removed within 30 days of deletion request
- Guest reviews and feedback: 5 years unless requested to remove earlier

Data Deletion Process

- Automated deletion occurs according to set retention schedules
- Manual deletion requests are processed within 30 days
- Backup copies are deleted within 90 days
- Third-party service providers are notified to delete relevant data

2. International Data Transfers

Cross-Border Data Processing. As a property located in the British Virgin Islands serving international guests, we routinely transfer personal data across borders. We implement the following safeguards:

Data Transfer Mechanisms

- Standard contractual clauses for transfers to service providers
- Data processing agreements with all international partners
- Encryption of data during transfer
- Secure cloud storage in certified data centers

Countries Where We Process Data

- British Virgin Islands (primary location, payment processing)
- United States (payment processing, cloud storage)
- European Union (marketing services, booking platforms)

Security Measures for International Transfers

- End-to-end encryption for all data transfers
- Regular security audits of transfer mechanisms
- Restriction of access to authorized personnel only
- Monitoring of international data flows

Your Rights Regarding International Transfers

- Right to information about where your data is processed

- Access to copies of data transfer safeguards upon request
- Option to restrict international transfers where possible

3. On-Property Data Collection

Physical Data Collection Points. We collect and process personal information at various points throughout our property:

Security and Access

- CCTV cameras in common areas and entry points
- Footage retained for 30 days
- Access restricted to security personnel
- Cameras clearly marked with signage
- No cameras in private areas or guest rooms

Guest Registration

- Physical registration forms at check-in
- Stored securely in locked office
- Digitized within 24 hours
- Physical copies shredded after 30 days

Access Control Systems

- Electronic gate control system
 - Access logs kept for 90 days
 - Data used only for security purposes
 - Logs include entry/exit times and locations

Wi-Fi Network

- Network usage logs retained for 30 days
- Basic connection data collected for security
- No monitoring of browsing activity
- Separate secure networks for guests and staff

Staff Data Handling Procedures

Our staff follow strict protocols when handling guest data:

- Confidentiality agreements required for all employees
- Regular privacy training for staff members
- Clear desk policy for guest information
- Restricted access to guest data based on job role

Photography and Recording

- Professional photography requires written consent
- Staff prohibited from taking guest photos
- Security footage used only for safety purposes
- Guest photography guidelines provided at check-in

Emergency Information

- Medical information collected only when voluntarily provided
- Emergency contact details stored securely
- Special needs information deleted after departure
- Incident reports retained for 3 years

Data Access on Property

- Guest data accessible only via secure systems
- Mobile devices require encryption and authentication
- No guest data stored on local devices
- Regular audits of physical data access points

Information Sharing

We do not rent or sell your personally identifying information to other companies or individuals. We may share your personally identifiable information in any of the following limited circumstances:

- We may disclose personally identifiable information to third party service providers (including, without limitation, local boat charter and excursion companies, companies providing chef services, event rental and transportation services) that use and process personally identifying information on our behalf. When this is done, it is subject to agreements that oblige those parties to use and process such information only on our instructions and in compliance with this Privacy Policy and appropriate confidentiality and security measures.
- We may disclose personally identifiable information if we conclude that we are required by law or regulation or have a good faith belief that access, preservation or disclosure of such information is reasonably necessary, as determined in our sole discretion, to protect the rights, property or safety of the Company, its employees, owners, third party service providers, and you.
- In the event of an actual or potential transfer of ownership of the holding, St. Bernard's Hill House, we may disclose personal information to the actual or potential buyer, and we may provide notice before any personally identifying information is transferred and becomes subject to a different privacy policy.
- We may share anonymized aggregated information with others. An Example of this includes how many users clicked on a particular linked site.
- We may use anonymized aggregated information in reporting on overall customer service and/or curated guest experiences to show effectiveness and identify areas for improvement.

You have the right to request access to your personal data and can request corrections if needed by contacting us via email (stbernardshillhouse@gmail.com).

Data Security

We take appropriate and reasonable security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data.

We restrict access to your personally identifying information to employees who need to know that information to operate, develop or improve our Services. Additionally, all third-party service providers used to provide guest experiences or process your data (payment information) are required to maintain the same level of security or greater.

No website or communication method can be considered totally safe from intrusion. Therefore, any information provided via the website or emailed is entirely at your own risk, and you agree to hold the Company harmless from and against any loss, liability, damage, or harm that may arise as a result of your providing any information via the aforementioned methods.

Do Not Track

Presently the website does not honor "do not track" settings on web browsers and does not offer you the opportunity to request that we not track your use of its Services.

Email Preferences

You can manage your email preferences, such as opt-out or unsubscribe from marketing emails sent by the Company, by adjusting your preferences in your account settings. You can also opt-out or unsubscribe from any future email communications from within each email correspondence that we send you.

Choices About How the Company Uses and Discloses Your Information

The Company strives to provide you with choices regarding the personal information you provide to it.

If you do not want the Company to use information that it collects or that you provide to it to deliver advertisements according to its advertisers' target-audience preferences, you can opt-out by sending the Company an email stating your request to the email address provided below.

The Company does not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

Changes to this Policy

Please note this Privacy Policy will change from time to time. We expect most such changes to be minor, but there may be changes that are more significant. Regardless, we will post those changes on this page and, if the changes are significant, we will also provide a more prominent notice. Your use of the website following any such modification constitutes your agreement to follow and be bound by the Privacy Policy as modified. For this reason, we encourage you to review the Privacy Policy whenever you use the website. The last date the Privacy Policy was revised is set forth below.

Disclaimer of Liability

Under no circumstances shall the Company be liable for any damages, including, but not limited to, direct, indirect, special, incidental, consequential or exemplary damages, that result from the use of the information collected because of the user's accessing the website or any service available on or through the website, even if we have been advised of the possibility of such damages.

Enforcement/Redress

If for some reason you believe that the Company has not adhered to the Privacy Policy, please notify us using the contact information below. We will do our best to respond to your concerns and, when appropriate, take steps to correct a problem. In any event, if any dispute arises under this Privacy Policy or through your use of the website, you agree to be bound by the venue and choice of law provisions of the British Virgin Islands.

Contact Information

If you have any questions about this Privacy Policy or the practices described herein, you may contact us at:

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Tortola, British Virgin Islands VG 1110
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