

# Consumer Reviews Policy

## 1. Definitions

1.1 The following defined terms apply to this Consumer Reviews Policy:

|                                    |                                                                                                                             |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| <b>Agent (we, us, our)</b>         | [Sea Gem, Newlyn]                                                                                                           |
| <b>Booking</b>                     | a consumer's reservation of the Property.                                                                                   |
| <b>OTAs</b>                        | Online Travel Agencies used by the Agent.                                                                                   |
| <b>Owner</b>                       | the Property owner who is deemed a trader under consumer rights legislation.                                                |
| <b>Property</b>                    | the property provided by the Agency on behalf of the Owner for the Booking.                                                 |
| <b>Reviewer (you, your)</b>        | the consumer leaving, or considering leaving, a review.                                                                     |
| <b>Service</b>                     | the agency service provided by the Agency.                                                                                  |
| <b>Third Party Review Platform</b> | any third party platform used by the Agent (or Owner) to obtain, manage or present consumer reviews and review information. |
| <b>Website</b>                     | [www.seagemnewlyn.co.uk]                                                                                                    |

## 2. Who can submit a review

- 2.1 We welcome reviews about your experience with us and your stay at the Property, directly and via Third Party Review Platforms.
- 2.2 We send all our customers who have made a direct Booking with us an invitation to submit a review. For more information about leaving reviews, please see the How to leave a review section.
- 2.3 We also welcome reviews about your experience by submitting a review via Third Party Review Platforms.
- 2.4 You can leave a review about a recent experience with us even if you haven't made a Booking. You can review the Service provided by us (for example, you can review how we handled your enquiry).
- 2.5 You must be over 18 to leave a review.

## 3. We do not incentivise reviews

- 3.1 We do not offer any incentives for reviews (whether positive or negative).

## 4. How to leave a review

- 4.1 To leave a review with us directly about your stay at the Property, you need to complete the feedback request provided via email at the end of your stay at the Property . If you have any questions, please contact us via the contact details on the Website.

- 4.2 We also use Third Party Review Platforms to collect reviews about the Service. Information about the Third Party Review Platforms we use, including links to guidance produced by the Third Party Review Platforms on submitting reviews can be found at the end of this policy.
- 4.3 Links to our Third Party Review Platforms are either:
- 4.3.1 sent automatically via email to consumers who make a Booking;
  - 4.3.2 accessible via the Website; and/or
  - 4.3.3 provided directly by the Third Party Review Platform.
- 4.4 If you booked your stay via an OTA, the OTA may request your feedback directly. The OTA's review collection process and policies will apply. Links to guidance produced by the OTAs we use on submitting reviews can be found at the end of this policy.
- 4.5 You can also leave feedback via publicly available websites such as social media channels and Google public review function.

## **5. Review Standards**

- 5.1 Your review must:
- 5.1.1 Reflect your genuine experience (both positives and negatives).
  - 5.1.2 Not be incentivised in any way.
  - 5.1.3 Not relate to a product or service you are connected with (for example, because you (or someone in your family) has a financial interest in or works for the business that provides it).
  - 5.1.4 Not manipulate ratings (for example, you cannot submit multiple reviews for the same product or service).

## **6. Where and how we display reviews**

- 6.1 We publish all reviews that comply with our Review Standards (whether positive or negative). Sometimes we remove old reviews and make clear the time period of review information being displayed.
- 6.2 Reviews for our Service or Properties made via Third Party Review Platforms or directly with OTAs may appear on the Third Party Review Platforms/OTAs website. Our Website also links to reviews made on some Third Party Review Platforms and OTA sites.
- 6.3 We may display review information such as an overall rating by averaging the ratings received. Where such information is displayed, we explain what information is being displayed and the calculation.
- 6.4 We reserve the right to hide all reviews (whether genuine or fake) and cease taking reviews at any time.

## **7. We may use your review in our marketing**

- 7.1 We may include all (or a representative part) of your review in our marketing material in any media (for example, on our website, in a brochure or in advertising). Your identity will not be revealed.

## **8. Please report suspicious reviews**

- 8.1 All reviews must comply with clause 5: Review Standards.
- 8.2 If you think any review is fake or otherwise does not comply with clause 5, please report to us via the contact details on our Website.
- 8.3 If you think any review submitted to a Third Party Review Platform is fake or otherwise does not comply with clause 5, please report to the Third Party Review Platform via the Third Party Review Platform website. Please see the end of this policy for useful links.

## **9. How we investigate and deal with suspicious reviews**

- 9.1 If our own monitoring or a report from you or someone else suggests that a direct review does not comply with the Review Standards, we will promptly investigate.
- 9.2 Our investigation shall commence on notification (clause 9.1) and we will use reasonable endeavours to complete the investigation within 30 days. Investigations shall be conducted by Jane and Howard Dawson.
- 9.3 We may:
- 9.3.1 immediately remove it (or not publish it, where it has been detected before publication). We will do this where we are certain it is non-compliant.
  - 9.3.2 investigate it further (which may involve contacting the reviewer for evidence that it is compliant) and flag it as a possibly fake review until our investigation is complete or remove the possibly fake review until our investigation is complete. If we then determine the review is non-compliant we will permanently remove it.
- 9.4 If we identify one review as non-compliant we may remove all reviews submitted by the same reviewer and refuse to publish any further reviews from the same reviewer.
- 9.5 If we remove a review or are investigating it, we will not include that review in any aggregated review score.
- 9.6 If you disagree with our decision as to whether a review is compliant, you can contact us via the contact details on our Website. We will deal with the issue you raise in accordance with our customer complaints procedure.
- 9.7 Where we host reviews regarding the products or services of other traders (e.g., reviews about the Owner and/or the Owner's Property) and, on assessment, deem the

trader responsible for the banned reviews, we may take the following additional steps if we deem necessary on an assessment of the facts:

- 9.7.1 notify consumers that the trader has benefited from banned reviews by putting a clear notice on the website;
  - 9.7.2 terminate the commercial relationship with the trader; and/or
  - 9.7.3 notify the CMA of the trader's breaches of the banned practices.
- 9.8 For information on how the Third Party Review Platforms sanctions people who submit fake reviews, please see the Third Party Review Platform's website.
- 9.9 If a review is removed from a Third Party Review Platform or otherwise does not comply with our Review Standards, we will remove it from our website.

[Consumer Review Policy Version 1]

#### Schedule 1 – Third Party Review Platforms

| Platform      | Use of the Platform                                         | Link to guidance provided by the Platform                                                                                                                                                                                                                                                                                                                         |
|---------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>OTA</b>    |                                                             |                                                                                                                                                                                                                                                                                                                                                                   |
| AirBnB        | Reviews of the Property where the Booking was made via OTA. | Reviews - <a href="#">Airbnb Help Centre</a>                                                                                                                                                                                                                                                                                                                      |
| [Booking.com] | [As above]                                                  | <a href="https://www.booking.com/content-moderation-policy/guest-reviews-standards.en-gb.html?aid=357028&amp;label=bin859jc-10Ehljb250ZW50LW1vZGVyYXRpb24tcG9saWN5KIICOOgHSDNYA2hQ">https://www.booking.com/content-moderation-policy/guest-reviews-standards.en-gb.html?aid=357028&amp;label=bin859jc-10Ehljb250ZW50LW1vZGVyYXRpb24tcG9saWN5KIICOOgHSDNYA2hQ</a> |
| VRBO          | As above                                                    | <a href="https://www.vrbo.com/vrbo.com">vrbo.com</a>                                                                                                                                                                                                                                                                                                              |

## Internal Risk Assessment – Questionnaire

We recommend using the following as a **starting point** for developing an internal risk assessment.

|                                                                                                                                                                     |                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance</b>                                                                                                                                                   |                                                                                                                                                                         |
| Who in the business will take ownership of the internal review process (and this risk assessment and policy)?                                                       | Jane and Howard Dawson                                                                                                                                                  |
| How frequently will you conduct a risk assessment?                                                                                                                  | Annually                                                                                                                                                                |
| Where will the risk assessment and investigation details be stored?                                                                                                 | On a secure private laptop                                                                                                                                              |
| <b>Detection</b>                                                                                                                                                    |                                                                                                                                                                         |
| Who will conduct the detection process e.g., checking the website for fake reviews?                                                                                 | Jane and Howard Dawson                                                                                                                                                  |
| How frequently will the detection process happen – this could be a minimum or approximate.                                                                          | Monthly                                                                                                                                                                 |
| Do you have, or plan to use, any software to assist with detection? Note, software alone is unlikely to be sufficient.                                              | No                                                                                                                                                                      |
| Will you involve a third party in the detection process? E.g., if you outsource your marketing.                                                                     | No                                                                                                                                                                      |
| What indicators will you use to identify fake reviews?                                                                                                              | Suspicious timing, generic phrasing, unusual reviewer profiles                                                                                                          |
| <b>Investigation and escalation</b>                                                                                                                                 |                                                                                                                                                                         |
| Who will conduct the investigation if a suspected fake review is found? Does the outcome of an investigation need sign off from another person / more senior level? | Jane and Howard Dawson                                                                                                                                                  |
| What would be a reasonable time frame for deadlines with investigations?                                                                                            | 30 days                                                                                                                                                                 |
| What steps will be followed during an investigation?                                                                                                                | Cross-referencing internal customer records. Analysing the reviewer's profile. Documenting evidence. Formally reporting the violation through the appropriate channels. |
| <b>Removal and remedial action</b>                                                                                                                                  |                                                                                                                                                                         |

|                                                                                                           |                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| What criteria will be used to decide whether a review should be removed or amended?                       | If a review is misleading, inaccurate, offensive or fake it will be removed.                                                               |
| How will you ensure reviews are removed from all displays? E.g., website, social media, aggregate totals. | We will remove the fake review from the website ourselves . If it is left another platform, we will make contact and ensure it is removed. |
| <b>Incentivised reviews</b>                                                                               |                                                                                                                                            |
| Do you offer (or plan to offer) incentives for reviews? If so, in what form?                              | No                                                                                                                                         |
| How will the incentivised nature of reviews be clearly disclosed?                                         | N/A                                                                                                                                        |
| What controls ensure incentivised reviews reflect genuine experiences?                                    | N/A                                                                                                                                        |
| <b>Publishing processes</b>                                                                               |                                                                                                                                            |
| How do you publish reviews? What is the display process?                                                  | Reviews are submitted through the website and then will be approved or removed if fake. They are then displayed on our Guestbook page.     |
| How are aggregated ratings, review counts or rankings calculated?                                         | They are calculated independently by the OTA.                                                                                              |
| <b>Complaint management</b>                                                                               |                                                                                                                                            |
| How can consumers raise concerns about reviews?                                                           | They are able to contact us through the website via email                                                                                  |
| How will complaints be handled?                                                                           | All complaints will be taken seriously and fully reviewed . Suitable action will then be taken.                                            |