



## **ROYAL CHACE HOTEL DATA PROTECTION POLICY STATEMENT**

As part of our commitment to meeting your expectations, we have set up a customer privacy protection policy. This formalises our commitment to you and describes how we use your personal data.

Consent to “Personal data” means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number) as a person. Before providing us with this information, we recommend that you read this document describing our privacy policy. This Personal Data Protection policy forms part of the terms and conditions that govern our hotel services. By accepting these terms and conditions, you expressly accept the provisions of this policy.

The main rules applicable are founded on the following seven principles:

### **1. ROYAL CHACE HOTEL SEVEN PRINCIPLES FOR PROTECTING YOUR PERSONAL DATA**

1. **Transparency:** When collecting and processing your personal data throughout the Hotel, we will communicate all information to you and inform you of the purpose and recipients of the data.
2. **Legitimacy:** We will collect and process your personal data only for the purposes described in this policy.
3. **Relevance and accuracy:** We will only collect personal data that is necessary for data processing. We will take all reasonable steps to ensure that the personal data we hold is accurate and up to date.
4. **Storage:** We will hold your personal data for the period necessary for processing in compliance with the provisions of the law.
5. **Access, rectification, opposition:** You may access, modify, correct or delete your personal data. You may also oppose the use of your personal data, particularly to avoid receiving sales and marketing information. The details of the department to contact and steps to be taken in this respect are shown below in the clause “Access and modification”.

6. Confidentiality and security: We will ensure reasonable technical and organisational measures are in place to protect your personal data against alteration or accidental or unlawful loss, or unauthorised use, disclosure or access.

7. Sharing and international transfer: We may share your personal data with third parties for payment processing, email services and other services essential to the running of the business (such as commercial partners and/or service providers) for the purposes set out in this policy. We will take appropriate measures to guarantee security when sharing or transferring such data.

## 2. SCOPE OF APPLICATION

This policy applies:

1. To all data processing implemented in our hotel
2. Including reservation websites, including [www.Royal-chace.com](http://www.Royal-chace.com)

## 3. WHAT PERSONAL DATA IS COLLECTED?

At various times, we will be obliged to ask you, as a Royal Chace Hotel customer, for information about you and/or members of your family, such as:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, nationality, medical conditions PEEP)
- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Your arrival and departure dates

The information collected in relation to persons under 18 years of age is limited to their name, nationality and date of birth, which can only be supplied to us by an adult. We do not deliberately collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of sexual orientation. Depending on applicable local laws, other information which could be considered sensitive, such as your credit card number, your leisure activities, may be collected in order to meet your requirements or provide you with an appropriate service, such as a specific diet. In this case, depending on the laws in force in certain countries, your prior consent may be required with regard to the collection of this sensitive information.

#### 4. WHEN IS YOUR PERSONAL DATA COLLECTED?

Personal data may be collected on a variety of occasions, including:

1. Hotel activities: Booking a room, Checking-in and paying, Requests, complaints and/or disputes.
2. Participation in marketing programs or events: Signing up for loyalty programs, Participation in customer surveys (for example, the Guest Questionnaire ), Subscription to newsletters, in order to receive offers and promotions via email.
3. Transmission of information from third parties: Tour operators, Travel agencies, GDS reservation systems, and others
4. Internet activities: Connection to Royal Chace Hotel website (IP address, cookies), Online forms (online reservation, questionnaires, Royal Chace Hotel social media pages on social networks, etc.).

#### 5. HOW WILL WE USE THE INFORMATION ABOUT YOU?

We collect your personal data for the purposes of:

1. Meeting our obligations to our customers.
2. Managing the reservation of rooms and accommodation requests: Creation and storage of legal documents in compliance with accounting standards.
3. Managing your stay at the hotel: Monitoring use of services (telephone, bar, etc.), Managing access to rooms, Internal management of lists of customers having behaved inappropriately during their stay at the hotel (aggressive and anti-social behavior, non-compliance with the hotel Contracts, non-compliance with safety regulations, theft, damage and vandalism, or payment incidents).
4. Improving our hotel service, especially: Processing your personal data in our customer marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes, Adapting our products and services to better meet your requirements, Customising commercial offers and the promotional messages we send to you, Informing you of special offers and any new services created by Royal Chace Hotel.
5. Managing our relationship with customers before, during and after your stay: Via Managing requests to unsubscribe from newsletters, promotions, [sale@royalchacehotel.co.uk](mailto:sale@royalchacehotel.co.uk)
6. Securing and enhancing your use of the Royal Chace Hotel website, especially: Improving navigation, Implementing security and fraud prevention.
7. Conforming to Local Legislation (for example, storing of accounting documents).

## 6. CONDITIONS OF THIRD-PARTY ACCESS TO YOUR PERSONAL DATA

To guarantee you the right of access and amendment (“Access and modification” clause), we have to share your personal data with internal and external recipients subject to the following conditions:

Within the Hotel, in order to offer you the best service, we can share your personal data and give access to authorised personnel from Royal Chace hotel , including:

- Hotel staff
- Reservation staff using Guestline reservation tools
- IT departments
- Medical services if applicable
- Any appropriate person within Royal Chace Hotel entities for certain specific categories of personal data.
- With service providers and partners: your personal data may be sent to a third party for the purposes of supplying you with a required service i.e. Florist, Disco services etc
- Local authorities: We may also be obliged to send your information to local authorities if this is required by Law or as part of an inquiry and in accordance with Local Regulations.

## 7. PROTECTION OF YOUR PERSONAL DATA DURING INTERNATIONAL TRANSFERS

For the purposes set out in Clause 6 of this policy, we may transfer your personal data to internal or external recipients who may be in countries offering different levels of personal data protection. Consequently, in addition to implementation of this policy, we employ appropriate measures to ensure secure transfer of your personal data entity or to an external recipient located in a country offering a different level of privacy from that proposed in the country where the personal data is collected. Other than those that are required to carry out your reservation, data flows to countries having different levels of personal data protection are regulated by standard contractual manager-to-subcontractor clauses defined by the European Commission. Data flows to the United States are made to entities that belong to Privacy Shield.

## 8. HOW WE SECURE YOUR INFORMATION

The Royal Chace Hotel takes data security seriously, and we use appropriate technologies and procedures to protect personal information. We apply the controls detailed in the Payment Card Industry Data Security Standard to all environments storing personal data. These standards are applied and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

For example:

- We have measures in place to protect against accidental loss and unauthorized access.
- We have a Business Continuity and Disaster Recovery strategy that is designed to safeguard the continuity of our service to our guests and to protect our people and assets.
- We place appropriate restrictions on access to personal information
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
- Training for employees and contractors
- We take steps to ensure that our employees and contractors operate in accordance with our information security policies and procedures

## 9. MARKETING

We would like to send you information about products and services which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes or giving your information. If you no longer wish to be contacted for marketing purposes, please email [headoffice@royalchacehotel.co.uk](mailto:headoffice@royalchacehotel.co.uk).

## 10. COOKIES

We use cookies when you visit our site. There are two main types of cookies – here's how and why we use them.

- (1) Site functionality cookies – these cookies allow you to navigate the site and use our features.
- (2) Customer preference cookies – when you are browsing, these cookies will remember your preferences (like your language or location), so we can make your experience as seamless as possible and more personal to you.

By using our site, you agree to us placing these sorts of cookies on your device and accessing them when you visit the site in the future. If you want to delete any cookies that are already on your computer, the "help" section in your browser should provide instructions on how to locate the file or directory that stores cookies. Further information about cookies can be found at <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>. Please note that by deleting or disabling future cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our site.

## 11. STORAGE OF DATA

We'll hold on to your information for as long as you have a booking with us, and for as long as is necessary to provide support-related reporting, or accounting purposes. We'll also hold on to your information if reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also keep hold of some of your information as required, even if it is no longer needed to provide the services to you.

## 12. ACCESS AND MODIFICATION

You have the right to access your personal data collected by Royal Chace Hotel and to modify it subject to applicable legal provisions. You may also exercise your right to object by writing to the email address below. If you have any questions, would like to request access, deletion or changes be made please email, [headoffice@royalchacehotel.co.uk](mailto:headoffice@royalchacehotel.co.uk)

In conclusion we may modify this policy from time to time. Consequently, we recommend that you consult it regularly.

26<sup>th</sup> May 2018