

TREVI GROUP PRIVACY NOTICE

This notice describes how we process your personal data.

This notice applies to:

- Bookers;
- Guests;

Summary of the purposes for processing your personal data and the legal basis for doing so:

- We process personal data to make, amend and administer room bookings, provide hotel services, process and provide other products and services, where available (such as meals and car parking). We also deal with enquires, gather customer feedback, undertake market research and direct marketing (including analysis to create profiles), in our legitimate interests to promote our business and improve our service and delivery.
- When booking with us, we don't ask for accessibility, dietary, health or other sensitive personal data. If you (or someone on your behalf) do provide such information to us, please be aware we may need to ask for your explicit consent. In some cases, it may be permissible for us to have such data as it is in your vital interests that we do so.

In our legitimate interests, we also seek to prevent and detect crime as well as protect our business and premises.

In order to fulfil the above purposes:

- we disclose your personal data to payment providers, technology providers, insurers, and other specialist professional and technical service providers and advisers, to manage your bookings, arrange payments, and provide services.
- We keep your data to enable us to fulfil our contract with you or to provide services, where required by law, to respond to a question or complaint, to obey rules about keeping records, to uphold or protect contractual or legal rights or where it is in your or another party's vital interests or our legitimate interests. Where we process personal data on the basis of your consent, we will retain it for as long as required for the specified purpose. We also keep your data in line with any statutory limitation periods and for tax, legal or regulatory purposes. and for a maximum of 25 months.

.Your rights

Any consent(s) you give us may be withdrawn at any time.

You also have the qualified right to:

- rectify, and ask to erase your personal data, requesting it directly to the Hotel;

Where you exercise any of your rights, we will process your personal data to comply with your request in accordance with our legal obligations.

You have the right to lodge a complaint with the data protection supervisory authority of the country in which you are resident, work or in which your complaint arises. For the contact details of the Information Commissioner in the UK see www.ico.org.uk, for Information Commissioner in the Isle of Man see www.inforights.im and for the Office of Information Commissioner in Jersey see <https://oicjersey.org> . Details of all EU supervisory authorities can be found at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

We may provide additional information during the booking and check-in process and at other points at which we collect your personal data.

Personal information we collect

We collect personal information when you book with us or request or use our services.

This includes:

- **Personal Identifiers** - title, name, marital status, postal and email addresses, postcode, and contact telephone numbers. We may also collect the names of those who are part of a group booking where necessary, and the age of children to meet your needs (e.g. to provide a cot) and enable us to confirm any restrictions that may apply to a room booking;
- **Customer special requests** - via form.

How do we use your information, and what is the legal basis for this use?

- **To fulfil a contract, or take steps linked to a contract. This is relevant when you want to make a reservation with us; or receive other products and services from us such as meals and includes:**
 - making, amending or administering your room booking and meal orders (where available);
 - providing products and services requested by you;
 - verifying your identity;
 - processing payments;
 - communicating with you;
 - providing customer services, including managing complaints; and
 - alerting you by text, email or phone in the event of an unplanned incident, as a result of which we have to make alternative arrangements under our contract (or where we believe it is in your vital interests).

If the information we request is not provided, we may not be able to enter into or comply with a contract or our legal obligations.

For purposes which are required by law:

- to record the identity and nationality of overseas guests (excluding the Republic of Ireland and Commonwealth citizens) on check-in. These guests will be asked to complete a registration form and provide their identity card/passport details, to comply with the Immigration (Hotel Records) Order 1972, as amended. Acceptable forms of identification are: a passport, driving licence, ID card or police warrant card.
- in response to requests by government, law enforcement authorities, or intelligence services and court orders;
- if required to comply with health and safety legislation to which we are subject;
- we may be required to share information with other licensees in accordance with local licensing requirements; and
- responding to a rights request under data protection legislation.

To protect your vital interests or those of another person:

- p disclosing your personal data to the emergency services where we believe it is necessary to protect your vital interests or the vital interest of another person; and
- where you (or a person acting on your behalf) provide us with dietary or other personal health data such as allergies.

Other parties

Personal data may be shared with regulators, government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim or regulatory purposes.

We disclose your personal data to payment providers, technology providers, insurers, and other specialist professional and technical advisers, to manage your bookings, arrange payments, and provide services.

With your consent, we will also disclose your personal data to Ombudsman services and Citizens' Advice.

Significant automated decision-making

Like many businesses we use business rules on financial and other information in order to detect and prevent fraud. When used, these may identify a risk and, as a result, a particular transaction may not be processed.

What rights do I have, contacting the Hotel?**Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent. We will continue to process your personal data for other purposes on a different lawful basis (other than consent) where that applies.

Other qualified rights

- You have the right to know whether or not we process information about you and to access that information.
- You have the right to update, correct and complete any information we hold about you which is inaccurate or incomplete.
- You have the right to obtain the personal data you provide to us for a contract or with your consent in a commonly used, structured, and machine-readable format, and to ask us to share (port) this personal data to another controller.
- You have the right to ask that we erase or restrict (stop active) processing of your personal data.
- In addition, you can object to the processing where the lawful basis is our legitimate interests.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person or you ask us to erase information which we are required by law to keep. Where you object to us processing personal information we may have a compelling justification for processing it. Relevant exemptions are also included within the data protection laws that apply in the UK. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have concerns, you have the right to complain to the data protection supervisory authority of the EU Member State in which you are resident, work or in which your complaint arises. In the UK, the supervisory authority is the Information Commissioner. Details of all EU supervisory authorities can be found at:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

How long will you retain my personal data?

We keep your data to enable us to fulfil our contract with you or to provide services, where required by law, to respond to a question or complaint, to obey rules about keeping records, to uphold or protect contractual or legal rights or where it is in your or another party's vital interests or our legitimate interests. Where we process personal data on the basis of your consent, we will retain it only for as long as required for the specified purpose. We also keep your data in line with any statutory limitation periods and for tax, legal or regulatory purposes.

The period for which we will retain your personal data depends on the purposes for which we are processing it and where the same personal data is processed for two or more purposes, we will retain it for the longest period. For example, we retain:

- for up to 25 months from your last stay, any personal data we process for managing your hotel or restaurant bookings;
- for up to 36 months after it is resolved, any personal data we process in relation to queries, complaints or feedback relating to your hotel or restaurant booking;
- for 3 years in the case of accident report forms (or for accidents relating to a child, for 3 years after the child's 18th birthday);
- for up to 6 years, financial and transactional data for the purposes of insights and analytics; and
- for up to 7 years, financial information for accounting, business reporting, analysis and audit purposes.

In any of the cases mentioned above, we may retain the personal data for longer, if it is required for the purposes of any internal or external investigation or litigation. In these cases, it may be retained until the matter is resolved. We may keep your data for longer in line with any limitation periods, or if we cannot delete it, e.g. for tax, legal or regulatory reasons.

You have the qualified right to request deletion of your personal data at any time, or we may choose or be obliged to erase your personal data earlier, for example, if we no longer need to process it.

How do I get in touch with you?

Queries and exercise of rights

If you have any queries or want to exercise any of your rights, please see the “Contact Us” page on our website..

General data protection queries

If you have any queries about the way we process your personal data, you can get in touch at

info@trevicollecionhotel.com

