



# Hastings Hotel Group Limited Data Privacy Notice

Welcome to Hastings Hotel Group's privacy notice.

## Overview

At Hastings Hotel we take your privacy seriously and we are committed to protecting your personal data. We aim to be clear about how we use personal data and this privacy notice will inform you as to how we look after your personal data, what personal data we process and why. It includes the relevant requirements of the General Data Protection Regulation. It applies both your visit our website (regardless of where you visit it from) and when you use our services.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice. It will give you information about:

1. Who we are and who is responsible for your personal data
2. Where you can contact us if you have any questions about how your personal data is processed by us
3. What types of personal data we process and where we get that personal data from
4. How we use your personal data and what our legal basis for doing so
5. Who we disclose your personal data to and why
6. Whether we transfer any of your data internationally
7. How we store your data securely
8. How long we hold your personal data for
9. Your rights to complain and how you go about making a complaint
10. the Glossary

## Changes to This Data Protection Notice

Like any business, our business will change over time and so will the way we use and protect your personal data. As a result, we may need to make changes to this General Data Protection Notice. These changes will not reduce your rights or the level of protection we apply to your personal information. The most up to date

General Data Protection Notice will always be published on our website and we will clearly identify the changes we have made in any updates.

## **1. Important information and who we are**

This privacy notice aims to give you information on how Hastings Hotel I collects and processes your personal data through your dealings with us, including your use of this website, any data you may provide through this website when you make a booking to stay in Hastings Hotel, sign up to our newsletter, use our gym or spa, book in one of our restaurants or any other service we offer or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

Hastings Hotel is the controller and responsible for your personal data (collectively referred to as "Hastings Hotel", "we", "us" or "our" in this privacy notice). When we refer to Hastings Hotel we mean:

Hastings Hotel Group Limited

Company Number: NI008164

Corporate Head Office, 1066 house, 587 Upper Newtownards Road, Belfast BT4 3LP

The Hastings Hotel Group comprises a number of hotels, you will receive marketing materials from all hotels in the group if you have opted into receiving marketing from us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. Where you can contact us if you have any questions about how your personal data is processed by us**

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager Pamela Shaw by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com).

## **3. What types of personal data we process, where we get that personal data from**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

As a hotel which also offers event, spa and gym services, we may need to collect use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data** includes billing address, email address and telephone numbers.
- Financial Data** includes bank account and payment card details.
- Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- Technical Data** includes internet protocol (IP) address and other technology on the devices you use to access this website.
- Marketing and Communications Data** includes your preferences in receiving marketing from us.

We also collect, use and share **Aggregated Data** such as statistical data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) unless we have your explicit consent to do so. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - book to stay in a Hastings Hotel;
  - use any of other services i.e. our restaurant, gym spa or event rooms;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing [unsubscribe@hastingshotels.com](mailto:unsubscribe@hastingshotels.com)

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Pamela Shaw by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity  | Type of data  | Lawful basis for processing including basis of legitimate interest                            |
|---|---|---|
| To register you as a new customer   | (a) Identity<br>(b) Contact   | Performance of a contract with you  |
| To process and deliver your booking including:<br><br>(a) Manage payments, fees and charges<br><br>(b) Collect and recover money owed to us | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you<br><br>(b) Necessary for our legitimate interests      |
| To manage our relationship with you which will include:<br><br>(a) Notify you about   | (a) Identity<br>(b) Contact   | (a) Performance of a contract with you<br><br>(b) Necessary to comply with a legal obligation |

|   |   |  |
|---|---|--|
| <p>information relevant to your booking with us;</p> <p>(b) Notifying you about changes to our terms or privacy policy</p> <p>(c) Asking you to leave a review or take a survey</p> | <p>(c) Profile</p> <p>(d) Marketing and Communications</p>  | <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>   |
| <p>To enable you to partake in a prize draw, competition or complete a survey</p>   | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>                      | <p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>  |
| <p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>      | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>   | <p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p> |
| <p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>                                 | <p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p> | <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>   |
| <p>To use data analytics to improve our website, products/services, marketing, customer</p>   | <p>(a) Technical</p> <p>(b) Usage</p>   | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to</p>  |

|  |  |   |
|--|--|---|
| relationships and experiences  |  | inform our marketing strategy)  |
| To make suggestions and recommendations to you about services that may be of interest to you | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

**Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside Hastings Hotel for marketing purposes.

**Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use please see Cookie Policy.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Pamela Shaw by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Who we disclose your personal data to and why

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. How we store your data securely

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting Pamela Shaw by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com).

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. What rights you have in relation to your personal data and how you can exercise these rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [\[Request access to your personal data\]](#).
- [\[Request correction of your personal data\]](#).
- [\[Request erasure of your personal data\]](#).
- [\[Object to processing of your personal data\]](#).
- [\[Request restriction of processing your personal data\]](#).
- [\[Request transfer of your personal data\]](#).
- [\[Right to withdraw consent\]](#).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Address: Information Commissioner's Office 3<sup>rd</sup> Floor, 14 Cromac Place, Belfast, BT7 2JB Tel: 028 9027 8757 or 0303 123 1114 Email: [ni@ico.org.uk](mailto:ni@ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You have the right to:

- Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete

or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Pamela Shaw by emailing [pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com)

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting Pamela Shaw, pshaw@hastingshotels.com](mailto:pshaw@hastingshotels.com)

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the Hastings Hotel Group acting as joint controllers or processors and who are based Northern Ireland and provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

Service providers acting as processors based who provide IT, marketing and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.

This Privacy Notice was last modified \_\_\_2<sup>nd</sup> May 2018\_\_\_\_\_