

ALVESTON HOUSE HOTEL PRIVACY NOTICE

The General Data Protection Regulation (GDPR) is a positive change towards giving you more control over how your information is used and how you can control that use. This privacy notice sets out how Alveston House Hotel uses, shares, stores and protects any information that you give to us when you use this website. By using our website, contacting us or working with us you are agreeing to be bound by this Policy.

Alveston House Hotel may change this policy from time to time by updating this page. You should check this page periodically to ensure that you are happy with any changes. This is the latest privacy policy and became effective from September 2018.

Identity and Contact details:

Alveston House Hotel, Alveston, Thornbury, Bristol BS35 2LA
Contact by mail to: info@alvestonhousehotel.co.uk

How we collect your information

We collect your information when you complete our online forms, call us or book/request information to stay with us or host an event through a third party (then your information is given to us through travel agencies or online booking agents). We collect your information when you enter our competitions or request to be added to our newsletters. We also collect your information using cookies from your computer when you visit our websites. This information may include the browser you are using, your language settings, the Internet Protocol address and other information about the computer or similar device which you are using. The information we collect includes your name, address, email address, special requirements (including room, accessibility, diet). When using Alveston House Hotel's complimentary Wi-Fi your information is not collected.

Use of 'cookies'

Like many other websites, the Alveston House Hotel uses cookies. This helps us to improve our website and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

What we do with your information

There are two legal bases upon which we collect, process and transfer your personal data as described in this privacy notice:

Contract basis – we need to collect personal data on you to be able to provide you with a quotation or to fulfil our contractual obligation (secure a room or restaurant table). If you are unable to provide this data, we are unlikely to properly perform our side of any contract with you.

- Consent basis – We rely on your consent to use your personal data to provide you with news, special offers and promotions.

We use the following information about you to complete a contract between us to provide you with accommodation, eating at our Hotel or hosting an event.

- Title, first name, family name
- Postal address – (home, business or other)
- Email address – (personal, business or other)
- Phone number – (home, business, mobile or other)
- Credit card details (submitted securely via Secure Trading’s online facility)
- Gender
- Company affiliation (if relevant)
- Arrival / Departure date
- Occupancy details (number of adults / number of children) and names
- Special requests/needs (dietary requirements, allergies, disabilities, newspaper preference, wake-up calls) – optional info given by you
- Room number and rate (if paying own account)
- Communication preference

To meet internal reporting needs:

- Booking channel used
- Date & time of reservation and any amendments

To comply with The Immigration (Hotel Records) Order 1972:

- Nationality, Passport number (and where issued)
- Next destination
- Date of birth (if we are required to do so under immigration regulations)

To protect us both:

- Telephone call details made on hotel phone (contract purposes)
- Food & beverage consumed / ordered on property (contract purposes)
- Any entries in the accident / incident book (legal obligations)
- Any interaction with hotel staff requiring comments to be added to your booking (contract and/or legal obligations)
- Signature (contract purposes)

Note: If you are booking on behalf of someone else, we collect much of the above information about you and about the third party on whose behalf you are making a booking.

B) After Check Out

We retain your information for a short period, so you can have your say and let us know how you enjoyed your experience.

- Post stay correspondence – comments and associated replies

- Feedback on various review sites, associated replies and subsequent correspondence

If you have agreed, we use relevant information to keep you updated on all our latest competitions, upcoming events and offers.

Transferring your information outside the EU

In most cases your data is stored within UK data centres and occasionally elsewhere in the European Union (EU). As many other hotels we use applications which are provided from Cloud Providers (Guestfolio), who is a member of the EU-US Privacy Shield Framework. We have a signed Data Processing Agreement with this company which states that it will treat personal information according to the requirements of the GDPR regulation.

We also use SiteMinder, which is a Global Cloud-based Hotel Management Solutions Provider who store their data in the US on Amazon Web Services – please visit their site for details on their privacy policy <https://www.siteminder.com/legal/privacy/>

By submitting your personal data, you're agreeing to this transfer, storing and processing of your data using these applications.

Storage of your information

We store your information as follows:

- encrypted on our servers on-premise, housed in our secure server room at Alveston House Hotel and backed up off-site in the UK (transmitted in an encrypted format). The data is stored within a front desk management solution provided by a UK supplier with whom we have a GDPR contract in place.
- with our Cloud providers (e.g. Microsoft's Office 365)
- We review our retention periods for personal information regularly. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information for as long as is necessary for the relevant activity, or if it is defined in any contract you hold with us.

Whom we share your information with

- Where your information is collected for news, special offers and promotional purposes by Alveston House Hotel we do not share this information with any third party.
- We use some third-party data processors who provide various services for us and who retain any personal data within the EU. We have agreed terms and conditions with these data processors. Our technical support services are in the UK and we have a contract with them to comply with EU General Data Protection Regulations (GDPR) when processing the personal data we hold.
- We may share your information with the relevant travel agency where your hotel accommodation at Alveston House Hotel is provided as part of a tour package organised by that travel agency. Where you chose to interact with a review site

(such as TripAdvisor), we may share some of your information with that site when addressing or acknowledging your comments.

- **Analytic Suppliers**

In common with many comparable hotel companies who use the internet we occasionally use your personal data to help Analytic Suppliers match relevant ads to you, using the data analytics of those Analytic Suppliers (e.g. Facebook, Google, Twitter and Microsoft). However, we only use the data in that way where you are a subscriber to the services of Analytic Suppliers and have therefore agreed to this service by acceding to the relevant Agreements of those Analytic Suppliers.

Analytic Suppliers supply us with statistical information on how users interact with our website to help us improve our user experience. We do not control these companies processing of this data outside the United Kingdom where those Analytic Suppliers process data.

- In the unlikely event that Alveston House Hotel is unable to accommodate you for any reason and transfers your reservation to an alternative hotel, we will share your details with that other hotel to ensure that your experience is as comfortable as possible under the circumstances.

We only hold your information for as long as it is required to carry out the activities described in this privacy notice and as required by Governmental authorities and relevant legislation. Where we are not sending you news, special offers and promotions then, unless there are exceptional legal reasons for keeping your information for longer, we only keep your information for as long as is required to comply with the normal contract law limitation period and HMRC requirements.

Your rights regarding your information

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email info@alvestonhousehotel.co.uk or use the information supplied in our 'Contact us' section. To process your request, we will ask you to provide two valid forms of identification for verification purposes.

Your rights are as follows:

The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

The right of access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you and the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed

- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, including the source data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

The right to restrict processing

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was based on consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

The right to object

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest;
- Processing is for direct marketing;
- Processing is for scientific or historic research
- Processing involves automated decision-making and profiling.

You may lodge a complaint about our handling of your information with the Supervisory Authority, Information Commissioner's Office at www.ico.org.uk/make-a-complaint/
