

The personal information we collect and when and why we use it

Personal information we collect and use if you make a booking with us

When you book or make travel related bookings with us, we will collect, process and use personal information so that we can deal with all aspects of your booking.

Types of personal information we collect

The types of personal information we collect when you make a booking with us includes your:

- name
- title
- address
- contact details (including email address and telephone/mobile number)
- gender
- booking reference
- payment card details
- nationality and other information for tax purposes (some countries only)
- meal preferences

How we use this personal information

We use your personal information to:

- **fulfil our agreement with you** and/or deal with your booking or intended booking, including processing your booking, sending you your itinerary or other details relating to your booking, or contacting you if there is a problem with your booking (for example, by sending you a service message to inform you when your booking has not been completed)
- **update you on changes to your travel itinerary** (for example, if there is a change to your booking pre travel)
- **process payments** for your booking, fulfil requests for refunds and for accounting or audit purposes
- **personalise the service and offers you receive** (for example, by being aware of previous travel experiences, transactions or preferences, and tailoring the way we provide our products or services to you based on your preferences and profile)
- **personalise the look and feel of our Platform and communications** with you, so as to align with preferences you may have told us about or which we have inferred from your use of our Platforms, and previous transactions (details on *How we use your personal information for marketing purposes, profiling and analytics* are below)
- **improve the products and services** we offer or help us to create new ones
- **conduct customer satisfaction surveys** so that we can obtain a better understanding of how we can continue to improve the products and services we offer or help us to create new ones. During these surveys we may collect personal information from you relating to your thoughts/comments about your experience with us

- **market our products and services** to you **manage our business** such as for systems testing, IT maintenance or development training, benchmarking and performance measurement
- **use in connection with your online account** (details on *Personal information we collect and use if you register an online account with us are below*)
- **as you may authorise or consent to additionally from time to time**

Special categories of personal information we collect and use

- **provide you with special assistance** (for example, where you tell us that perhaps you need a wheelchair access)
- **fulfil special dietary requirements** you tell us about
- **address a security or medical incident**
- **comply with legal or regulatory requirements**
- **as you may authorise or consent to additionally from time to time**

Where your religion or health status could be inferred from meal preferences, we will not link this information or use it in any other way other than to fulfil your meal request. We do not generally collect special categories of personal information from you (or those you are booking for), but where we do, we seek to minimise the collection and use of it and handle it with extra

Making a booking on behalf of another person

If you are making a booking on behalf of another person(s), it is your responsibility to obtain their consent to make the booking and share their details with us (as anticipated by this Privacy Notice), which we will assume that you have done prior to making the booking. It is also your responsibility to represent that person during the booking process, which means that you will need to provide us with the information required to make a booking, such as the full name and passport details of the person concerned, and explain to that person how we will use their personal information as set out in this Privacy Notice. Where required by local laws, we would advise you to keep a record of their agreement and provide them with a copy of, or link to, this Privacy Notice. Each person in a booking will be able to view the phone number and/or email of the other person(s) in a booking and update such information. Any operational messages sent to one member of a booking will also be sent to the person who made the booking.

Personal information we collect and use if you register an online account with us

When you register to use one of our Platform, we collect, process and use personal information to manage your registration. Once you register, this will enable you to manage your account and preferences.

Types of personal information we collect

The types of personal information we collect from you when you register for an online account includes your:

- name
- title
- date of birth
- address

- contact details (including email address and telephone/mobile number)
- country of residence
- nationality
- preferred language
- organisation/company name, address, telephone number

Once you register an online account member the types of personal information we collect from you includes:

- transaction details
- your preferences (such as your favourite seat, drink or meal on flights)
- your personal lifestyle interests (such as in sports, theatre or hobbies)
- marketing preferences
- medical needs in connection with your travel

How we use this personal information

We use the personal information we collect if you register an online account, together with the *Personal information we collect and use if you make a booking with us*, to:

- **manage the online account** in accordance with its terms and conditions
- **personalise the service and offers you receive** (for example, by being aware of previous travel experiences, transactions or preferences, and tailoring the way we provide our products or services to you based on your preferences and profile)
- **communicate and interact with you** at different touch points throughout your journey (for example, in the event of service failures, compliments or complaints)
- **authenticate log-ins to your online account and detect and prevent fraud** in connection with your online account
- **as you may authorise or consent to additionally from time to time**

Any information we collect will also be used in accordance with the terms and conditions of the online account.

Personal information we collect and use if you have any queries about any of our products or services

If you have any queries about any of our products or services, compliments or complaints, or requests such as invoices, we will need to collect information from you, including your contact details, in order for us to respond to your query or provide you with assistance. We will collect this information when you submit a form on our Platform, send us an email, call our customer service centre, or contact us via another form of communication such as through social media or an online chat tool.

Types of personal information we collect

The types of personal information we collect includes your:

- name
- title
- address

- contact details (including email address and telephone/mobile number)
- booking reference

Depending on the nature of your query, we may need to collect special categories of personal information from you so that we can properly understand the nature of your query or request. More details on *Special categories of personal information we collect and use* are above.

We also keep a record of the communications we have with you to comply with relevant legal obligations and to make and defend claims. When you visit our hotel you will be monitored by closed circuit television (CCTV) for security purposes. In each case, we do so in compliance with applicable laws.

How we use this personal information

We use your personal information to:

- **address your inquiry or any other interaction with us** as efficiently as possible
- **analyse the types of inquiries received** to improve our products and services and interactions with our customers
- **to authenticate your identity** such as when you call us.
- **manage any claims you make for compensation or otherwise**
- **as you may authorise or consent to additionally from time to time**

Personal information we collect and use in the event of an emergency

Types of personal information we collect

The types of personal information we collect include your:

- name
- title
- address
- contact details (including email address and telephone/mobile number)
- gender
- emergency contact
- booking reference

Personal information we collect and use when you use our Platforms

Our Platforms use cookies. A “cookie” is a small computer file which is downloaded to your device. It collects information as to how you navigate our Platforms and the internet, and helps us provide better Platform services to you and tailor certain content. Cookies may collect personal information about you. For more information on how we use personal information when you use our Platforms and how to manage cookie settings see **When and how we undertake analytics and profiling** and *Cookies* below.

Personal information we collect and use for legal, compliance, regulatory and crime detection and prevention purposes

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interest of other persons.

We also process your personal information for crime prevention and detection purposes, including the prevention of fraud for online payments, for identity verification, for credit checking and credit scoring purposes and accounting or audit purposes.

Personal information we collect and use from third parties

We collect personal information from third parties who you have authorised to provide your personal information to us (for example, this may be your travel agent or another person making a booking on your behalf, your travel companion, your travel coordinator, our promotion partners, social media and other digital platforms). We combine this information with the information we collect directly from you or about you for the purposes set forth in this Privacy Notice. More details on **Sharing your personal information with others** is below.

We also collect personal information from individuals who may refer you as a friend to our products or services. We ask these individuals to confirm that you are happy to hear from us.

Personal information we collect and use when you are making a payment

We collect different personal information depending on your payment method (such as credit card, bank transfer, cash). For example, for credit card payments we may collect the credit card holder name, address, card number, expiry date and CVC code. You may also choose to store your credit card details with us for future use. We do not store your CVC/CVV code (which is the security code on the back of a credit card).

Legal basis for using your personal information

We will only collect, process use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- we need to use your personal information to perform a contract or take steps to enter into a contract with you. For example, to manage your booking with us, to take payment for your booking, to complete your travel arrangements;
- we need to use your personal information for our legitimate interest as a commercial organisation. We may also capture your interactions with our website and booking journey via tools on our website in order to identify errors or issues and ensure your customer experience meets expectations. In all such cases, we will look after your information at all times in a way that is proportionate, that respects your privacy rights and is in accordance with our Privacy Notice, and you have a right to object to processing as explained in ***Legal rights available to help manage your privacy***;
- we need to use your personal information to comply with a relevant legal or regulatory obligation that we have.

Sharing your personal information with others

We share your personal information in the manner and for the purposes described below:

- to develop a single view of our customers' transactions, interactions, preferences and behaviours ; to improve the products and services we offer or help us to create new ones and for marketing, profiling and analytics as detailed in Personal information we collect and use for marketing purposes, profiling and analytics below; and for the purposes described in this Privacy Notice.
- with third parties who help us manage our business and deliver our products and services, including loyalty schemes. These third parties have agreed to confidentiality

obligations and use any personal information we share with them or which they collect on our behalf solely for the purposes of providing the contracted service to us. These third parties include service providers who help manage our IT and back office systems, detect fraudulent transactions and security incidents, provide customer service centre support, manage airport operations, manage communications and tailor marketing and advertising; verify payments such as banks and payment card companies; manage our data warehouses; provide internet services; host our facilities; and conduct research that assists us with understanding consumer interests.

- with third party advertising and social media platforms to provide advertising as detailed in **Personal information we collect and use for marketing purposes, profiling and analytics** below;
- bank and payment providers to authorise and complete payments;
- with governments, government organisations and agencies, border control agencies, regulators, law enforcement and others as permitted or required by law, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;

Personal information we collect and use for marketing purposes, profiling and analytics

How we use personal information to keep you up to date with our products and services

We will only send you direct marketing, whether about us, products or services, in accordance with your marketing preferences. We may contact you by email, SMS/text, social media, or through other communication channels that we think you may find helpful. If at any time you would like us to stop sending you marketing material, **contact us** or choose the relevant "unsubscribe" option set out below.

How you can manage your marketing preferences

To protect your privacy and to ensure you have control over how we manage marketing with you (and provided that you have indicated that you would like to receive it):

- we will take steps to limit direct marketing to a reasonable and proportionate level;
- only send you communications which we believe may be of interest or relevance to you and at all times in line with your permissions, which, as appropriate, may include:
- you can click the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by **contacting us** or changing your account settings which will remove you from the relevant marketing list;
- if you do not want to be served with our advertisements within social media or other digital platforms, you can manage your preferences within these platforms.

When and how we undertake analytics and profiling

Analytics We aggregate personal information and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse Platform use, to improve our content and products and services, to customize our Platforms' content, layout, products and services, and to support our business operations and we may appoint third parties to do this on our behalf, as set out above in **Sharing personal information with others**.

We gather certain usage information like the number and frequency of visitors to our Platform.. This collective data helps us to determine how much our customers use parts

of our Platform, and do research on our users' demographics, interests, and behaviour to better understand and serve you. One of the ways we do this is by installing and using Cookies on your browser or device. You can find out more about cookies and our Cookie Policy in the section entitled **Cookies** below.

Profiling

We use personal information such as your date of birth, gender, country of residence, transactions (for example, payments made with us and flights taken), information derived from Cookies and your preferences and behaviours for profiling. Some of the legitimate purposes we profile personal information include:

- to obtain a better understanding of what you would like to see from us and how we can continue to improve our services for you;
- to personalise the service and offers you receive from us, including with invitations to special events;
- to provide you with tailored content online and optimise your experience of our Platform;
- to help us operate our services more efficiently;
- to authenticate log-ins on our Platform and detect and prevent fraud.

Where required under applicable privacy laws:

- we will take steps to ensure that prior to profiling your personal information for a legitimate interest that our legitimate interest is not overridden by your own interests or fundamental rights and freedoms; and
- you may have rights to object to us profiling your personal information. You can learn more about such rights in *Legal rights available to help manage your privacy*.

How we protect and store your personal information

Protection of your personal information

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal information that you share with us and safeguard the privacy of such information. For example, the measures we take include:

- placing confidentiality requirements on our staff members and service providers;
- destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected; and
- following security procedures in the storage and disclosure of your personal information to prevent unauthorised access to it; and
- using secure communication channels such as SSL ("secure sockets layer") or TLS ("transport layer security") for transmitting data that is sent to us. SSL and TLS are industry standard encryption protocols used to protect online transaction channels.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information. Here are some simple steps you can take to ensure your personal information is kept securely:

- keep your booking reference confidential - upon making a booking a unique booking reference will appear on the email confirmation or ticket of each person in your

booking. It is important that you keep your booking reference confidential at all times. Other persons may be able to access your booking details through our system if you disclose your booking reference to them;

- if you are travelling in a group and would prefer that your individual booking details are not available to other passengers you may choose to have each person make a separate booking (to be paid for individually);
- Customer log-in details confidential. You should not share your log in details with anyone else. You should also log out when you finish using our Platform. This is especially important if you are using a publicly accessible computer; and
- be aware of "Phishing", which is where someone tries to represent themselves as someone else to gain information from you - always check whether emails from any sender are actually from them, and if in doubt, go directly to their website and do not click on links in emails, as these may take you to "clone" websites which use your information illegally.

Storage of your personal information

We keep your personal information for as long as is reasonably necessary for the purposes for which it was collected. For example, to manage bookings and provide you with any relevant products or services, as explained in this Privacy Notice. We will ensure that it is disposed of in a secure manner. In some circumstances we may store your personal information for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

If you require further information about how we retain particular information please **Contact Us**.

Cookies

A "cookie" is a small computer file which is downloaded to your device. It collects information as to how you navigate our Platforms and the internet, and helps us provide better Platform services to you and tailor certain content.

Cookies may collect personal information about you. Cookies help us remember information about your visit to our Platforms, like your country, language and other settings and searches. Cookies enable us to understand who has seen which webpages and how frequently, and to determine which are the most popular areas of our Platforms. They can also help us to operate our website more efficiently, and make your next visit easier and customise your view of the Platforms to reflect your preferences and activities. They also help us tailor our marketing and advertisements to you on our Platforms, other websites you visit, social media platforms and your other devices. For more information on how we use cookies please read our **Cookie Policy**, where you can also find information so you can delete cookies or block certain types of cookie. You should note that this may have an impact on our ability to provide the Platform services to you.

See also our section on ***When and how we undertake profiling and analytics***.

Legal rights available to help manage your privacy

If you are subject to laws that provide you with such rights, depending on certain exceptions, and in some cases dependent upon the processing activity we are undertaking, you may have certain rights in relation to your personal information:

- To access personal information
- To rectify / erase ('right to be forgotten') personal information
- To restrict the processing of your personal information
- To object to the processing (including direct marketing) of personal information
- To transfer your personal information
- To obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

If you wish to access any of the rights set out above, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for example, if your request is manifestly unfounded or excessive. You can exercise your rights by sending us a communication at bookings@hotel65.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: the source of your personal information; the purposes, legal basis and methods of processing; the data controller's identity; and the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see *right to object*); or
- it has been processed unlawfully; or

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

Right to object to the processing (including direct marketing) of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

You can request that we stop contacting you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

If you have joined our mailing list, you can manage your marketing preferences automatically by clicking the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by **contacting us** or changing your account settings which will remove you from the relevant marketing list.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

We may redact data transfer agreements to protect commercial terms.

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority (i.e. your place of habitual residence, place of work or place of alleged infringement) if you have concerns about how we are processing your personal information. We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

How to contact us

The primary point of contact for all issues arising from this Privacy Notice is our Data Privacy Officer, who can be contacted by sending us a communication to bookings@hotel65.com

If you have any questions, concerns or complaints regarding our compliance with this Privacy Notice, we encourage you to first contact our Data Privacy Officer. We will investigate and attempt to resolve complaints and disputes as quickly as possible and in any event, within the timescales provided by applicable data protection laws.

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