

CAISTOR HALL HOTEL PRIVACY POLICY

We are committed to preserving the privacy, integrity and security of the personal information we hold about our customers and those who make contact with us. We have developed this Privacy Policy to explain how we manage and use this personal information and to ensure we comply with our legal obligations under applicable data protection laws.

It is important that you read this privacy policy carefully so that you are fully aware of how we collect and process personal information.

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PERSONAL INFORMATION WE COLLECT AND HOLD AND THE PURPOSE FOR WHICH WE USE IT

This Privacy Policy applies to all personal information collected by MDH, by whatever means, both about its customers and about its contacts. The first section below applies to customers and explains under 4 separate headings what personal information we collect about customers, how we collect it, what we use it for and the legal basis on which we rely to do so. The second section below provides all the same information for our contacts, again under 4 separate headings.

CUSTOMERS

What personal information do we collect from our customers?

The personal information we collect may include:-

- (i) name, email address, home and/or business address, phone number;
- (ii) bank account and payment card information;
- (iii) booking history;
- (iv) transactional data including details about payments to and from you and other details of products and services you have purchased from us;
- (v) information relating to your use of our services, such as room preferences, special requests, feedback and survey responses; and
- (vi) marketing preferences.

How is our customers' personal data collected?

We will collect this data from you when you provide it to us by phone, email, post, through our website or in person.

Legal basis for processing our customers' information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:-

- (i) it is necessary for the performance of a contract between us for the provision of services or in order to take steps at your request prior to entering into such a contract; and/or
- (ii) it is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

Occasionally we may also rely upon the following legal bases for processing:-

- (i) you have given your consent to the processing; and/or
- (ii) it is necessary for us to comply with a legal obligation on us; and/or
- (iii) it is necessary to protect your vital interests or those of another individual.

Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us using the contact details set out under "HOW TO CONTACT US" below or by emailing

What do we use our customers' personal information for?

We intend to use your personal information for the following purposes:-

(i) to fulfil your bookings and/or to provide services or facilities you request from us;

(ii) to collect payment from you;

(iii) to administer and manage our relationship with you, which may include asking you to complete surveys or feedback forms;

(iv) where you have made a reservation with us, to send you information before your visit to confirm the reservation and to provide you with other information relating to your reservation which we think you may find of interest;

(v) to send you information relating to the loyalty club (if you are a member) (such as loyalty club redemptions and vouchers) and relating to your membership of our clubs (if you are a member);

(vii) where required by law; and

(viii) where necessary to protect your health or well being or that of another individual.

CONTACTS

What personal information do we collect from our contacts?

The personal information we collect may include:-

(i) name, email address, home and/or business address, date of birth, phone number; and

(ii) marketing preferences

How is our contacts' personal data collected?

We will collect this data from you when you provide it to us by phone, email, post, through our website or in person.

Legal basis for processing our contacts' information

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these: -

(i) you have given your consent to the processing; and/or

(ii) it is necessary for the purposes of our legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

Occasionally we may also rely upon the following legal bases for processing:-

- (i) it is necessary for us to comply with a legal obligation on us; and/or
- (ii) it is necessary to protect your vital interests or those of another individual.

Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us using the contact details set out under "HOW TO CONTACT US" below or by emailing enquiries@caistorhall.co.uk

What do we use our contacts' personal information for?

We intend to use your personal information for the following purposes: -

- (i) to fulfil your requests for information;
- (ii) to send you marketing and promotional material where we think this may be of interest to you (unless you have objected to receiving this)
- (iii) where it is required by law; and
- (iv) where necessary to protect your health or well being or that of another individual.

MARKETING TO YOU

You may receive marketing communications from us: -

- (i) if you have specifically requested that information from us; or
- (ii) by email, text or post, if you are a customer and you have not opted out of receiving that marketing (which you may do by contacting us using the contact details set out under "HOW TO CONTACT US" below or by emailing enquiries@caistorhall.co.uk
- (iii) by post, if you have not opted out of receiving that marketing (which you may do by contacting us)

Otherwise, we will not send you any marketing communications unless we have your explicit consent.

Please note, you can ask us to stop sending you marketing messages at any time by emailing enquiries@caistorhall.com.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION REQUESTED

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, 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 booked with us but we will notify you if this is the case at the time.

SHARING YOUR PERSONAL INFORMATION WITH OTHERS

We will not disclose personal information we hold about you to any third party except where required by law or as follows: -

- (ii) to third parties who provide services to us, and act as data processors for us;
- (iii) to professional advisers including lawyers, bankers, auditors and insurers;
- (iv) to HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

Also in the event that we sell any business or assets, we may disclose personal information we hold about you to the prospective and actual buyer of such business or assets. 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 Policy.

Please note that 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.

TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EEA

We do not intend to transfer any personal data we hold about you to a country outside the European Economic Area ("EEA").

If however we do transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards applies: -

the countries to which it is transferred have been deemed to provide an adequate level of protection for personal data by the relevant regulators; we have put in place with the transferee specific contracts approved by the relevant regulators which give personal data similar protection to that it has in Europe; or
if the transferee is in the US, it is registered with the Privacy Shield (or any

similar replacement scheme) which requires it to provide similar protection to personal data as is required in Europe.

DATA SECURITY

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.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We will only retain your personal information 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.

In some circumstances you can ask us to delete your data: see under **YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION AND YOUR OTHER RIGHTS**/to 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.

We will take all reasonable steps to destroy, or erase from our systems, all the personal information we hold about you when it is no longer required.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION AND YOUR OTHER RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

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;

to 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;

to 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. It also enables you to request that we 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;

to 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;

to request restriction of processing 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;

to request 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; or to 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 us by using the contact details set out below under "HOW TO CONTACT US" below or by emailing enquiries@caistorhall.com.

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.

If you wish to exercise any of those rights we may need to request specific information from you to help us confirm your identity. 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.

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.

MANAGING YOUR PERSONAL INFORMATION

We want you to give choices regarding use of your personal information for marketing and advertising purposes. We have established a privacy centre where you can view and make certain decisions about your personal data use and if you wish to access this please email us at enquiries @caistorhall.com

Moreover if at any time you believe that any personal data we are holding about you is inaccurate, out-of-date or incomplete, please tell us by emailing us at enquiries@caistorhall.com

CHANGES TO THIS POLICY

We may need to make changes to this Privacy Policy from time to time to take account of changes in law or the needs of our business. Please refer back to this page regularly to see any changes or updates to this Policy.

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.

HOW TO CONTACT US

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:-

By Post:

FAO: GDPR Marketing

Caistor Hall Hotel, Stoke Road, Caistor St Edmund, Norwich. NR14 8QN

By Email:

Enquiries@caistorhall.com

COMPLAINTS

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection laws you have the right to lodge a complaint at the Information Commissioner's Office (ICO) (<https://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.