



This is privacy notice of **The Old Wisteria Hotel Ltd.**

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

**1. WHO WE ARE AND IMPORTANT INFORMATION**

**2. THE PERSONAL DATA WE COLLECT ABOUT YOU**

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**4. HOW WE USE YOUR PERSONAL DATA**

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**1. WHO WE ARE AND IMPORTANT INFORMATION**

**What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you book a room with us or sign up to our newsletter.

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

You must read this privacy notice together with any other privacy 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.

4 Catmos Street, Oakham, LE15 6HW. 01572 722844 I [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk)

## **Data controller(s)**

The Old Wisteria Hotel Ltd is the controller and responsible for your personal data (collectively referred to as ["COMPANY"], "we", "us" or "our" in this privacy notice). Our contact details are:

Registered address: 4 Catmos Street, Oakham, LE15 6HW

Email address: [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk)

Postal address: 4 Catmos Street, Oakham, LE15 6HW

Phone number: 01572722844

For all data matters contact our Data Protection Officer using the above contact details.

The Old Wisteria Hotel Ltd is the controller and responsible for this website.

## **Third-party links outside of our control**

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. THE PERSONAL DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes: Your full name, marital status, title, date of birth, nationality, gender, data about family members and companions, such as names and ages of children, employers details, language preference,
- **Contact Data** includes: Billing address, postal address, email address, telephone numbers
- **Financial data** includes: credit card or debit card number and payment details
- **Other personal data** includes: important dates such as anniversaries & special occasions
- **Usage data** includes: information about how you use our website, products and services
- **Technical data** includes: IP address, browser type and version, location, operating system and platform, other technology on the device you use to access this website
- **Marketing & communications data** includes: our preferences in receiving marketing from us and your communication preferences

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). Nor do we collect any information about criminal convictions and offences.

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### **If you fail to provide personal data**

Where we need to collect your 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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

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

- **Directly.** You may give us your identity, contact and financial by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you make a reservation, purchase goods and services from our Website, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
- **Hotel Visits and Offline Interactions.** We collect Personal Data when you visit our hotel or use on-property services and outlets, such as our restaurant or bar. We also collect Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.
- **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 and other similar technologies. Please see our cookie policy for further details.
- **Strategic Business Partners.** We collect Personal Data from companies with whom we partner to provide you with goods, services or offers based upon your experiences at our hotel or that we believe will be of interest to you ("Strategic Business Partners"). Examples of Strategic Business Partners include travel and tour partners and travel booking platforms. Strategic Business Partners are independent from the Old Wisteria Hotel Ltd.
- **Third parties or publically available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical data from the following parties:
    - **Analytics providers** such as Google based outside the EU
    - **Search information providers**
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Barclaycard and American Express.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **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:

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- **Performance of Contract** this 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.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the 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).
  - **Personalise our service according to your Personal Preferences.** We use Personal Data and Other Data to personalise the services we provide and to improve your experiences, including when you contact our hotel or use our website to:
    - Customise your experience according to your Personal Preferences
    - Present offers tailored to your Personal Preferences
 We will use Personal Data and Other Data to provide personalised Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.
  - **Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:
    - Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys
 We will use Personal Data and Other Data to communicate with you with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.
  - **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, monitoring customer satisfaction, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities. We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **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**

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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.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us, have signed up to our newsletter 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.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by emailing us at [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk) 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 or service purchase.

### **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 our 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 us at [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk).

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 SHARE YOUR PERSONAL DATA WITH**

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

- External Third Parties such as:
  - **Service Providers** acting as processors based in the United Kingdom who provide IT and system administration services.
  - **Professional advisers** acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide banking, legal, insurance and accounting services.
  - **HM Revenue & Customs**, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

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- Specific third parties such as our Strategic Business Partners i.e. travel and tour partners and travel booking platforms.

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**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **7. 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.

## **8. DATA RETENTION**

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.

By law we have to keep basic information about our customers including contact, identity, financial and transactional data for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** 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. YOUR LEGAL RIGHTS**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;

- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk).

### **No fee required – with some exceptions**

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 admin 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. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on the 11<sup>th</sup> of June 2018.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## **11. QUERIES, REQUESTS OR CONCERNS**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer at [enquiries@wisteriahotel.co.uk](mailto:enquiries@wisteriahotel.co.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.