

# THE ROYAL GARDEN HOTEL POLICY AND PROCEDURE



SUBJECT:	PRIVACY NOTICE
ISSUED BY:	SECURITY
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REFERENCE NUMBER:	PP/SEC/GDPR/20/20
PREPARED BY:	J MCKEOWN
APPROVED BY (Executive Manager):	
APPROVED BY (General Manager):	

## PURPOSE AND SCOPE

This policy sets out the procedures which must be followed in order to ensure that all data captured and processed by the Royal Garden Hotel is done so in line with the GDPR regulations.

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## 1.0 General

1.1 All data subjects whose personal data is collected in line with the requirements of the GDPR.

## 2.0 Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to the Royal Garden Hotel collecting/processing their personal data.

2.2 All Employees of the Royal Garden Hotel who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3.0 Privacy notice

3.1 The Royal Garden Hotel is part of the Goodwood group of hotels with the corporate office in Singapore. We provide services in the context of hospitality that includes the provision of accommodation, conference and events spaces and food and beverage outlets.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- (0207 937 8000)
- (dpo@royalgardenhotel.co.uk)
- 0207 937 8000

The personal data we would like to collect from and process from you is:

<b>Personal data type:</b>	<b>Source</b> (where Royal Garden Hotel obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name, address, telephone numbers and e-mail address. Passport details for registration	Direct from you or via an agent working on your behalf
Method of payment for service received	Direct from you
Next destination (legal requirement)	Direct from you
Dietary requirements/allergies or any other detail that you wish to bring to our attention	Direct from you

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The personal data we collect will be used for the following purposes:

- Confirming your stay with us
- Confirming a booking with us
- Establishing a method of payment
- Contact you pre stay
- Contact you post stay for your opinion upon your stay

Our legal basis for processing for the personal data:

- Contractual obligation
- Legal Requirement
- Consent (once obtained)

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Your feedback upon the service provided
- Contact you post stay to resolve any outstanding matter

The special are:

- Ethnic Origin
- Health data
- Racial

## 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for the Royal Garden Hotel to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by either opting out upon any e-mail we send, visiting our web site, contacting us at the address provided below.

## 3.3 Disclosure

Royal Garden Hotel will not pass on your personal data to third parties without first obtaining your consent.

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
Organisation Name & geographic location		

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### 3.4 Retention period

Royal Garden Hotel will process personal data for the length of your stay and will store the personal data for a period of 3 years following your last transaction with us. This amendment has been inserted due to the temporary closure of the hotel during the ongoing unusual situation in order that we retain the ability to serve you in line with expected standards upon reopening.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that the Royal Garden Hotel refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by the Royal Garden Hotel (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and the Royal Garden Hotel's data protection representatives, Data Protection Officer.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
Contact	Information Commissioner's Office	DPO

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Name:		
Address line 1:	Wycliffe Water lane	Royal Garden Hotel
Address line 2:	Wilmslow	2-24 Kensington High Street
Address line 3:	Cheshire	London
Address line 4:	SK9 5AF	W8 4PT
Address line 5:		
Email:	ICO Website for contact	dpo@royalgardenhotel.co.uk
Telephone:	<b>0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number</b>	+44 (0) 207 937 8000

### 3.7 Privacy statement

Read more about how and why we use your data here [www.royalgardenhotel.co.uk](http://www.royalgardenhotel.co.uk)

### 4.0 Online privacy statement

#### 4.1 Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one

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or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

## How we use your information

This privacy notice tells you how we, the Royal Garden Hotel will collect and use your personal data to provide you with the service requested and to record details on any allergies or other concerns you may wish to bring to our attention. We will also use this information to confirm your future business dealings with us, deal with any complaints you may have and to contact you in regard to any outstanding matters.

## Why does Royal Garden Hotel need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for legal reasons concerning your stay and further data in order to tailor your stay with us so that we are able to provide the best service and therefore experience possible. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes the Royal Garden Hotel would contact you for additional consent.

## Will Royal Garden Hotel share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to the Royal Garden Hotel in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf when they no longer need your data to fulfil this service, they will dispose of the details in line with the Royal Garden Hotel's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## How will Royal Garden Hotel use the personal data it collects about me?

Royal Garden Hotel will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Royal Garden Hotel is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Under what circumstances will Royal Garden Hotel contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

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## Can I find out the personal data that the Royal Garden Hotel about me?

Royal Garden Hotel at your request, can confirm what information we hold about you and how it is processed. If the Royal Garden Hotel does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Organisation Name or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## What forms of ID will I need to provide in order to access this?

Royal Garden Hotel accepts the following forms of ID when information on your personal data is requested: Passport, National driving licence, birth certificate and a utility bill not more than 3 months old.

## Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact	Data Protection Officer

# THE ROYAL GARDEN HOTEL POLICY AND PROCEDURE



Name:	
Address line 1:	Royal garden Hotel
Address line 2:	2-24 Kensington High Street
Address line 3:	London
Address line 4:	W8 4PT
Address line 5:	
Email:	dpo@royalgardenhotel.co.uk
Telephone:	+44 (0) 207 937 8000