



## GDPR Privacy Policy - (General Data Privacy Regulations)

Updated: 20<sup>th</sup> May 2018

Set out below is our privacy policy, we will cover the following items:

- What information is being collected?
- Who is collecting it?
- How is it collected?
- Why is it being collected?
- How will it be used?

### Our Privacy Promise

We take your privacy seriously and we respect your privacy and data protection rights. This privacy notice aims to give you information on how we collect and process your personal data through your use of our website, including any data you may provide through our websites and our services when you sign up to receive news, offers, promotions and updates.

Please take time to read this privacy notice in full, together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, to ensure that you understand and are happy with how we collect and process your personal data. This privacy notice supplements the other notices and is not intended to override them.

### 1. Controller

The Royal Hotel Skegness is the main controller of the data we hold, we do not share this information with any 3<sup>rd</sup> party.

### 2. Contact Details

Our full details are:

**The Management team**  
**Royal Hotel Skegness**

**South Parade, Skegness, Lincolnshire, PN25 3EH**

**Telephone: 01754 762301**

**Email: [management@theroyalhotelskegness.co.uk](mailto:management@theroyalhotelskegness.co.uk)**



## 3. Changes to this Privacy Notice and Changes to Your Details

We will need to update this privacy notice from time to time as the law and/or our business changes and develops. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise, please look out for the flags on our websites and materials that indicate we have changed this privacy notice. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

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

## 4. Third Party Links

Our 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, mobile app and/or service, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.

## 5. The Personal Data We Process

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may process different kinds of personal data about you, which we have categorised as follows:

- **Identity Data:** including your name, username (or similar unique identification numbers that we may apply to you), email address, marital status, title, date of birth and gender.
- **Contact Data:** including you billing address, delivery address, email address and telephone number(s).
- **Financial Data:** including payment card details.
- **Transaction Data:** including the details of the products and services purchased and the date, time and location of sale and your purchasing activity (including vouchers and coupons activity).
- **Technical Data:** including information we collect through your use of our websites and mobile apps, where you came to our website from and where you went when you left our website, how often you visit and use our websites and mobile apps, technical information about the devices you use to access our websites and mobile apps (including your device's unique identifying codes (e.g. its "MAC" address), relevant IP address, operating system and version, web browser and version, and geographic location).
- **Profile Data:** including your username and password, purchases, orders or bookings made by you, your interests, your preferences, your feedback, your survey responses, your social media content (where this is in the public domain including posts and comments, pictures and video footage) and profile information and insight from organisations that already hold information on you (such as credit reference agencies and 'customer insight companies' who give us their views on your household, your status, as well as your possible preferences and behaviours).



# The Royal Hotel Skegness

- **Usage Data:** including information about how you use our website, mobile apps, products and services (such as details of your table reservations).
- **Marketing and Communications Data:** including your preferences in receiving marketing from us and our third parties, your communication preferences and information on what you view, click on and access in and through our marketing emails, text messages and push notifications.
- **Sensitive Data:** including information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. **Aggregated Data** may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your **Usage Data** to calculate the percentage of users accessing a specific website feature. However, if we combine or connect **Aggregated Data** with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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 products 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.

## 6. Sensitive Data

In certain situations we have to collect Sensitive Data about you. Under data protection law this is known as “special category” data and includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health and genetic and biometric data.

**When do we process Sensitive Data?** We only collect and process Sensitive Data where you provide such information to us in the following situations:

- As part of any feedback and/or complaints which you raise with us, for example where you believe you have suffered a **health issue** following a visit to one of our venues (for example, suspected food poisoning or another health and safety incident), or where you believe we have been **discriminatory** against you (for example, discrimination based on race or sexual orientation). When you provide details of what happened, this may include giving us Sensitive Data. We are allowed to process this Sensitive Data (together with any other relevant information), to investigate, address and resolve your issue and to administer any possible legal claims or out-of-court procedures.
- Where you are **applying for a job** with us. In this situation, we can process your Sensitive Data because it is necessary for carrying out our obligations and rights related to employment law and your working capacity.



## 7. Profiling

We do, from time to time, process personal data about you in an automated way to evaluate certain personal aspects about you, including enabling us to analyse and make predictions about your interests and how you are likely to interact with us. This is commonly referred to as profiling and it is our way of providing you with a more bespoke customer experience based on how we think you engage with us.

## 8. How we collect your personal data

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

- **Direct Interactions:** you may give us your Identity, Contact, Financial, Profile and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you purchase our products or services, book a table with us, order a takeaway, create an account with us, subscribe to our services, news, offers, promotions and updates or groups, request marketing to be sent to you, enter a competition or promotion, complete a survey or give us feedback.
- **Social Media Interactions:** our website and services may allow you to interact with them by using your social media applications. This interaction may result in us collecting some of your social media content (including posts and comments, pictures and video footage), but only where this content is in the public domain and/or where this content has been sent by you to us in a private message via social media; and also your Technical, Profile and Marketing and Communications Data.
- **Automated Technologies:** as you interact with our website and our services, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Other Third Parties or Publicly Available Sources:** we may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google, advertising networks search information providers.
  - Marketing and Communications Data and Technical Data from online advertising data providers such as Google based outside the EEA.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Profile Data and Marketing and Communications Data from social media providers such as Facebook based inside and outside of the EEA
  - Identity, Contact and Profile Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.



## 9. How we process your personal data

We only process your personal data when allowed to do so by law. Most commonly, we will process your personal data:

- With your consent and please note that you have the right to withdraw your consent at any time by contacting us. See above for details.
- Where we need to perform a contract we are about to enter into, or have entered into, with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

## 10. How We Keep Your Personal Data Secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times. We have also 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.

Please take care of your own information. For security tips and tricks when using the internet, Wi-Fi and smartphones or tablets, please visit [www.getsafeonline.org](http://www.getsafeonline.org).

## 11. Our Retention of Your Personal Data

We can only keep your personal data for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining 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.

## 12. Your Rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).



# The Royal Hotel Skegness

- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or 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. Please 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.
- **Rectification:** you may request rectification 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.
- **Erasure:** you may request erasure of the personal data that we hold about you. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to 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.
- **Object:** you may object to how we are processing 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.
- **Restriction:** you may request that we restrict how we process 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.
- **Withdrawal of Consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. 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.

To exercise any of these rights please contact us using the details in above.