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Cushion*

The Crown & Cushion Privacy Notice

Last updated on May 22nd 2018

Introduction

This privacy notice covers the actions of The Crown & Cushion ("The Crown & Cushion" or "We"). The Crown & Cushion takes your privacy seriously and will only use your personal data as set out in this Privacy Notice. We are committed to protecting any personal data you provide us, whether that data is provided directly or via a third party.

We have endeavoured to make this document as easy as possible to read. We reserve the right to amend this notice from time to time. Therefore we would encourage you to review this Privacy Notice regularly.

If you have a query about this Privacy Notice or our data protection practices you can contact us:

- by email at info@thecrownandcushioneton.co.uk

COLLECTION OF PERSONAL DATA

Below is a list of the circumstances in which your personal data is collected by The Crown & Cushion together with a brief explanation as to why we need that personal data. It is the kind of personal data that you would expect to provide in the normal process of making travel arrangements

The circumstances in which we collect your personal data

We have broken down the types of data we collect and process into the following circumstances:

- Hotel: if you are a guest or a potential guest
- If you are an individual experiencing our Hotel facilities (for example for a family celebration)
- If you make a payment directly to us

In each case we have indicated below the major interactions where we collect data from you.

Hotels: if you are a guest or a potential guest

A) When you make a reservation, when you check-in and during your stay.

So we know who you are

- Title, first name, family name
- Postal address – (home, business or other)
- Email address – (personal, business or other)
- Phone number – (home, business, mobile or other)
- Credit card details
- Company affiliation (if relevant)
- Car registration (if any)

So we can be ready to welcome you

- Arrival date
- Departure date
- Occupancy details (number of adults / number of children)
- Name of guest(s) sharing accommodation
- Special requests / needs including:
 - about your food preferences: dietary requirements
 - about your needs and preferences: for example any allergies (such as to feather pillows)
 - about you: for example any disabilities

To meet internal reporting needs

- Booking channel used
- Date & time of reservation
- Date & time of any amendments

For us both to confirm we have your requirements correct

- Room number
- Room rate (if paying own account)
- Communication preference

In order to comply with The Immigration (Hotel Records) Order 1972

- Nationality
- Passport number
- Where passport issued
- Next destination
- Date of birth if we are required to do so under immigration regulations

In order to protect us both

- Any entries / incidents in the Duty Manager's log
- Any entries in the accident / incident book
- Any interaction with reception that necessitated entering alerts or comments
- CCTV imagery
- Signature

Note: If you are booking on behalf of someone else, we collect much of the above information about you and about the third party on whose behalf you are making a booking.

To meet internal reporting needs

- Arrival time
- Departure time

B) After Check Out

So you can have your say and let us know how you enjoyed your experience

- Post stay correspondence – comments and associated replies
- Feedback on various review sites and associated replies and subsequent correspondence

If you are an individual using our facilities (for example for a family celebration)

A) When you make a reservation, when you check-in and during your stay.

So we know who you are

- Title, first name, family name
- Postal address – (home, business or other)
- Email address – (personal, business or other)
- Phone number – (home, business, mobile or other)
- Credit card details

- Company affiliation (if relevant)
- Date of birth if we are required to do so under immigration regulations
- Car registration (if any)
- Facilities to be hired

So we can be ready to welcome you

- Arrival date
- Departure date
- Name of guest(s) sharing accommodation
- Special requests / needs including:
 - about you and your guests food preferences: dietary requirements
 - about you and your guests needs and preferences: for example any allergies
 - about you and your guests: for example any disabilities

To meet internal reporting needs

- Booking channel used
- Date & time of reservation
- Date & time of any amendments

For us both to confirm we have your requirements correct

- Facilities hired
- Amount charged
- Communication preference

In order to protect us both

- Any entries / incidents in the Duty Manager's log
- Any entries in the accident / incident book
- Any interaction with reception that necessitated entering alerts or comments to the booking
- CCTV imagery
- Signature

Note: If you are booking on behalf of someone else, we collect much of the above information about you and about the third party on whose behalf you are making a booking.

To meet internal reporting needs

- Arrival time
- Departure time

B) After Departure - So you can have your say and let us know how you enjoyed your experience

- Post stay correspondence – comments and associated replies
- Feedback on various review sites and associated replies and subsequent correspondence

If you make a payment directly to us

- Where you pay us by a credit or debit card, we have a secure payment portal to process the payment. We keep credit card details for up to thirty days after departure, however, we do not store or hold the CCV number.

OTHER USES OF YOUR PERSONAL DATA

In order to make our services more efficient for you, we, along with most hotels and businesses, use third party outsource service providers which have partial access to some of your data. We use these suppliers in order to provide services such as booking the facilities available in the hotel; running reception; providing housekeeping; booking tables, rooms and other facilities.

Our use of Third Party Outsource Service Providers

CCTV

In common with the majority of comparable hotel companies we use CCTV (Closed Circuit Television) recording equipment on our properties and the immediate environs. We generally keep records from these cameras for up to hundred (100) days. We use this equipment and these recordings for the reduction and investigation of crimes and unacceptable behaviour.

Analytic Suppliers

In common with the majority of comparable hotel companies that use the internet we occasionally use your personal data to help Analytic Suppliers match relevant ads to you using the data analytics of those Analytic Suppliers. However, we only use the data in that way where you are a subscriber to the services of Analytic Suppliers and have therefore agreed to this service by acceding to the relevant Agreements of those Analytic Suppliers.

We mean by Analytic Suppliers companies such as: Facebook; Google; Twitter and Microsoft. Analytic Suppliers supply us with statistical information on how users interact with our website to help us improve our user experience.

We do not control the countries outside the United Kingdom in which those Analytic Suppliers process data.

TRANSFER OF DATA

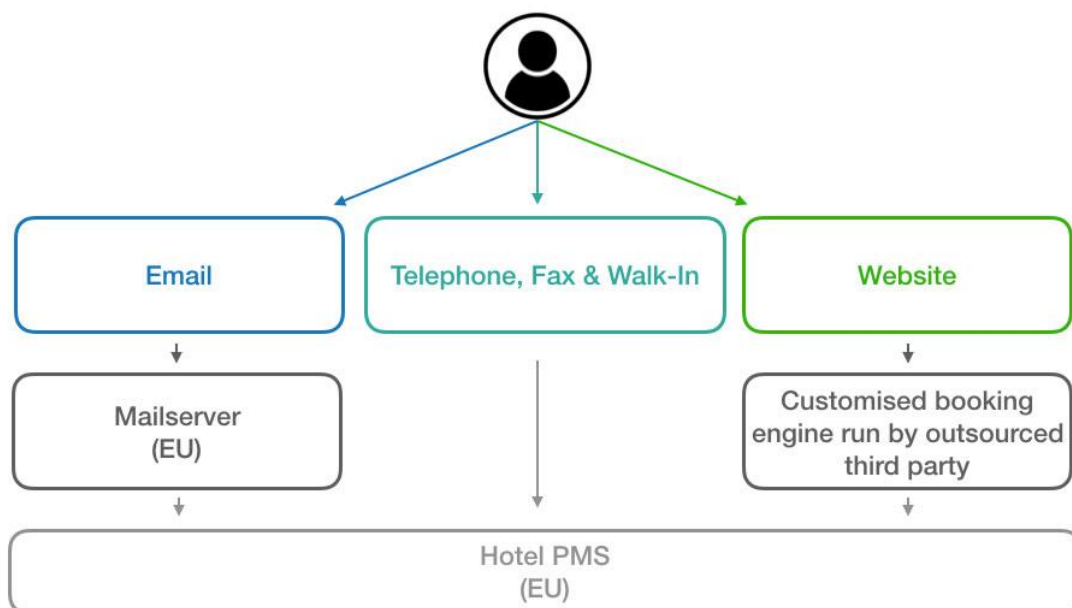
In conforming with British and European data protection laws, we endeavour to implement reasonable procedures to protect your personal data and to prevent any unauthorised access or misuse of it. The Crown & Cushion servers, on which your personal data is kept, are located in the United Kingdom.

Hotels

A) Reservations made directly with the hotel

You may make a reservation directly with The Crown & Cushion, in which case the collection of your personal data is as described above.

The diagram below illustrates the way in which you may make a direct booking with The Crown & Cushion.



- Reservations via Telephone/Fax or Walk-In – your personal data is entered directly into the hotel’s property management system located within the UK.
- Reservations via Email – Emails for The Crown & Cushion are delivered into a mail server located within the UK, and then entered into the hotel’s property management system located within UK.
- Reservations made on The Crown & Cushion’s website –This software solutions provider is located in UK. That company has confirmed to us that it

complies with European Union data protection legislation in its transfer of data to the United States. That data transfer is secured by guarantees under standard contractual clauses.

B) Reservations with Third Party Booking Agents, Meeting & Event Agents, & Travel Supply Companies

Where you make your reservation with a third party site, such as a travel company or any other third party booking agent, this privacy notice does not apply to your personal data that is collected by that third party site. The Crown & Cushion encourages you to enquire about the data privacy practices of these third party sites directly with those sites.

These companies will deliver the data which they have collected from their customer to The Crown & Cushion via one of the following routes:

Fax data is sent across the public telephone network directly to the hotel.

Emails are delivered to The Crown & Cushion email server located within UK, which is managed under the data safety policies of Data Protection Act and General Data Protection Regulation.

When you make a reservation via an independent third party booking service, for example a Global Distribution System "GDS", that third party will transmit certain data which they collect about you to us. Typically, that information may include:

- Title, first name, family name
- Email address – (personal, business or other)
- Gender
- Date of birth
- Postal address – (home, business or other)
- Telephone number
- Payment personal data
- Passport details

OTHER INFORMATION CONCERNING YOUR PERSONAL DATA

Why is personal data being collected? There are three legal bases upon which we collect, process and transfer your personal data as described in this privacy notice:

Why is personal data being collected?

There are three legal bases upon which we collect, process and transfer your personal data as described in this privacy notice:

- Contract – to consider potential or to fulfil actual contracts with you. If you are not able to provide this data, it is possible that we will be unable properly to perform our side of any contract with you.
- Legitimate Interest – In order to consider potential or to fulfil actual contracts with you, we need to collect and process personal data about you. We also have a legitimate interest in sending you news, special offers and promotions.
- Consent – We may also rely on your consent to use your personal data in order to provide you with news, special offers and promotions.

To opt out of receiving communications in respect of news, special offers and promotions from us please contact us as below:

- by email at info@thecrownandcushioneton.co.uk

With whom will we share your personal data?

Where the personal data is collected for news, special offers and promotional purposes, The Crown & Cushion does not share this data with any third party.

We may share data with the relevant travel agency where your hotel accommodation at The Crown & Cushion is provided as part of a tour package organised by that travel agency. Where you chose to interact with a review site (such as TripAdvisor), we may share some of your data with that site when addressing or acknowledging your comments.

In the unlikely event that the hotel is unable to accommodate you for any reason, and has to transfer your reservation to an alternative hotel, we will share your details with that other hotel to ensure that your experience is as comfortable as possible under the circumstances.

We pass relevant details to the appropriate third party where you ask us to arrange further services for you which we do not ourselves supply, for example, excursions or taxis. We share some of your data in this way in order to facilitate the efficient provision of our services, or for contractual reasons. Those contractual reasons may include for example the passing of payment or commission; provision of terms and conditions associated with the service provision or customer feedback.

None of these third parties are agents for The Crown & Cushion and The Crown & Cushion is not the representative of those third parties and therefore we are not responsible for your personal data which is collected by these companies and passed

to us. We encourage you to check the privacy policy of whichever of these third parties you have used to make your booking with us.

For how long do we keep your personal data?

Your personal data will only be kept for as long as it is required in order to carry out the activities described in this privacy notice, or as required by Governmental authorities and relevant legislation.

Where we are no longer sending you news, special offers and promotions then, unless there are exceptional legal reasons for keeping your data for longer, we do not keep your personal data for more than seven (7) years. This is to allow for the normal contract law limitation period and for tax purposes.

What are my rights?

The data protection legislation gives you a number of rights. These rights include:

- Right to be forgotten which is explained under the heading "How do I opt out" above.
- Right to make a "subject access request", which is a request for a copy of the data which we hold about you. In order to exercise this request please email info@thecrownandcushioneton.co.uk.
- Right of correction (or where appropriate erasure) of data which we hold about you where this is inaccurate.
- Right to data portability
- Right to withdraw your future consent to our processing your personal data.
- Right to contact and can be contacted:
 - By email at: info@thecrownandcushioneton.co.uk.
- Right to complain to the Office of the Information Commissioner.

Please be aware that if you exercise one of these rights, that in order to protect your privacy, we may require you to undergo some verification tests to ensure that we are dealing with you.

You have the right to be informed of the matters stated in this privacy notice.