

# Beachcroft Hotel & Suites

## Customer Privacy Policy

The Beachcroft Hotel Ltd. is committed to ensuring that your personal data is processed fairly and lawfully, is accurate, is kept securely and is retained for no longer than is necessary. The guidelines that we follow are contained in our “Data Protection Policy” which is available on request.

This “Privacy Notice” sets out what data we collect, how we process it and who we may share it with and why.

It also explains your rights with respect to the Personal Data that we may collect from you; that is data that identifies you as an individual or from which you may be identified.

### Why do we need this Privacy Notice & Data Protection Policy?

On 31<sup>st</sup> December 2020 the EU General Data Protection Regulation (GDPR) was replaced by the UK GDPR which sits alongside an amended version of the Data Protection Act (DPA 2018).

On 28<sup>th</sup> June 2021 the UK was awarded “Adequacy Status” with the EU, allowing the two-way flow of information within the European Economic Area (EEA) until 27<sup>th</sup> June 2025 subject to regular review.

These regulations are intended to better protect individuals by ensuring that Companies, Public Authorities, Charities etc. look after your data properly and within clear guidelines. You may see the term “Data Subject”, this refers to someone whose information or data is held by an organisation.

\*At the time of issue the “Data Protection & Digital Information (No.2) Bill” is at the report stage in the House of Commons. In its current format it mirrors rather than radically departs from the UK GDPR & Data Protection Act 2018. In general its aims are to clarify and simplify some aspects of the current regulations. This document will be re-issued when / if the Bill is subject to Royal Assent.

### Who are we?

#### Beachcroft Hotel Ltd

Beachcroft Hotels Ltd. – 05579118, C/O Bishop Flemming LLP, 10 Temple Back, Bristol, UK, BS1 6FL. T/A Beachcroft Hotel & Suites, Clyde Road, Felpham, Bognor Regis, West Sussex, PO22 7AH – for simplicity referred to as “The Beachcroft” in the remainder of this document.

### Who in the Company is responsible for ensuring that we meet our obligations for data protection?

The responsible person is called the “**Data Controller**” (DC) and is registered with the “**Information Commissioner’s Office**” (ICO) – the ICO is the Regulator in the UK for Data Protection. Our Registration No. is ZA204337, you can check our details on the ICO’s website via this link - <https://ico.org.uk/ESDWebPages/Search>.

The Data Controller is Mr. P Roberts and he can be contacted as follows:

By Email: [proberts@beachcroft-hotel.co.uk](mailto:proberts@beachcroft-hotel.co.uk)

Or in writing to:

The Data Controller, The Beachcroft Hotel & Suites, Clyde Road, Felpham, Bognor Regis, West Sussex, PO22 7AH

### Why do we collect and process your personal data?

The main reason that the Beachcroft or our “Agents / Contractors” process personal data is to manage bookings for the Hotel & Restaurant and to comply with the legal obligations relating to Immigration (Hotel Records).

We also collect data when Visitors use our Wi-Fi systems when on our premises.

We provide the legal bases that we use to process your data later in this document

The Beachcroft may also process personal data if at least one of the following applies:

- In order to protect the vital interests of an individual.
- There is explicit consent.
- For financial transactions relating to our Services.
- For the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- For reasons of public interest in the area of public health
- For reasons of substantial public interest, based on law, which is proportionate in the circumstances and which provides measures to safeguard the fundamental rights and the interests of the Data Subject.
- To ensure compliance with the legal restrictions placed on the use of the Internet.

## **Bookings made through a Third Party Website, Telephone Service or Agent.**

When you make a booking through a 3<sup>rd</sup> Party, by any method, they will generally pass only limited Data to the Beachcroft, this may include the following information to allow us to fulfil your order:

- Your Name & Contact details.
- Email Address
- Payment Card Details.
- Booking Dates.
- Specific Room Requirements.
- Loyalty Card Details.
- Any additional specific notes or requests that you ask to be communicated to the Beachcroft.

**Additional information that you supply to any booking organisation as part of their “Terms & Conditions”, Membership etc. will be subject to their Privacy Notice & any Agreement you have with them.**

**It is important that you read any Third Party’s Privacy Notices as we have no control over data entered into their systems or how it may be used in the future.**

## **What sort of personal information could we be collecting about you and processing?**

**The categories of information that we collect, process, hold and share include:**

- Personal information (such as name, address, phone number, email address)
- Credit or Debit Card information.
- Membership details of Loyalty Schemes
- Special categories of data including gender, nationality and age banding.
- Passport details if a non-UK Citizen

**We are aware that some Customers voluntarily provide sensitive medical information to us. This information is kept securely and only shared with key Staff and its use is restricted to:**

- Assisting those with disabilities or difficulties to safely evacuate the Hotel or Beach Huts in an emergency.
- Ensuring the suitability of the services or accommodation offered.
- Enabling the provision of additional assistance where necessary.
- Protecting vulnerable individuals.

**CCTV is used in some areas of the Beachcroft for reasons of Safety, Security & Crime Prevention, this data is stored for a limited time. Only the management team can access stored images.**

## **Do we pass or share your personal information with anyone else?**

We will not give your information or personal details to anyone outside the Beachcroft other than those listed below without your consent, unless we are required by the law to do so.

We routinely share information with the following, who are controlled by a specific Data Processing Agreement (DPA) which limits the extent to which they may use and process your data to the purposes that we require:

- Booking Management System
- Best Western International
- Best Western GB
- Our Marketing Representative – CJ Hotel Consultancy
- MARCOM *Computing*

The Booking Management System stores and manages booking information on our behalf and is not shared with any other party. This Data is stored in either a UK or a European Data Centre.

Our Marketing Representative CJ Hotel Consultancy is charged with maintaining our Marketing Database and ensures that only those that “Opt-in” to Marketing or Special Offers receive communications from us.

- **You can opt out of any such communications at any time by clicking on the “Unsubscribe” link on our emails. You can also email [proberts@beachcroft-hotel.co.uk](mailto:proberts@beachcroft-hotel.co.uk) requesting to be removed from the marketing databases. Please put “Unsubscribe” as the subject matter.**
- **We will never supply your data to an unauthorised Third Party without your explicit consent.**

MARCOM Computing, our ICT Contractor monitors access to and usage of the Internet via the Beachcroft Wi-Fi facilities and associated connection systems to ensure legal compliance and prevent misuse.

- **Our Wi-Fi uses a captive portal; by choosing to use this free service you agree to the capture of data from your device which may include and is not limited to:**
  - **Name & other Personal Information depending on your Device Settings**
  - **Email Address**
  - **IP Addresses, Mac Code & other Information that might Identify your Device**
  - **Browsing History, Bandwidth Used & Logon Times / Location within the Premises**
- **You also agree to your email address being used for our Marketing purposes, there is however an option to Opt-out of this, which will still provide Internet access but for a limited period.**
- **Children under 16 years must only use the Wi-Fi Connection with full Parental Supervision.**
- **Note: By visiting certain websites when using our systems, you may be revealing data about yourself that is considered to be within the “Special Categories of Personal Data”, these might include sites that reveal political opinions or sexual preferences.**

MARCOM passes selected information to our Marketing Representative but does not pass this information to any other 3<sup>rd</sup> Party unless required by law to do so.

## Storage & protection of your data!

We use a wide variety of means to protect your data from:

- Loss, Alteration or Corruption
- Unlawful Use
- Unauthorised access (Access is limited to a few authorised personnel)

Procedures are in place to deal with any suspected data breaches and we will notify you and the Regulator of any Breach where we are legally required to do so.

## How long will we retain your data?

Some data such as records of financial transactions will be kept for seven years for audit and tax purposes, registration cards for 1 year to meet legal requirements.

At the Beachcroft our principle is not to retain any data or personal information for longer than is necessary in relation to the purposes for which it was collected. We will always be driven by best practice to ensure that Information will be held in accordance with the latest guidelines.

## What are the Legal Bases we use to collect data?

When you book accommodation or the restaurant online, by telephone or via a third party we collect the information that is necessary to fulfil our obligations to you to deliver the requested service. **This data is processed under the basis of Contract.**

- Additional information that you may provide such as information about disability or vulnerability is **processed under the basis of Consent.**
  - Note that Data which is considered to be Special Category is handled by a limited number of authorised individuals.
- Data captured via our Wi-Fi Systems is also **processed on the basis of Consent**

Overseas visitors will be required to provide their Passport Details and Country of Residence, this data is **processed on the basis of Legal Obligation** and will be retained for 1 year.

Although most of our Marketing is conducted on the basis of **Consent** there will be occasions when we carry out Marketing Campaigns using data provided by Third Parties where you have indicated a willingness to receive information on Special Offers or Events where we will use **Legitimate Interest as the Basis for our communication.**

## What are my rights regarding the data you hold about me?

Under UK GDPR you have a number of rights which include:

1. Being informed of data processing (which is covered by this Privacy Notice).
2. Accessing information (also known as a Subject Access Request (SAR)) that we hold on you. In some circumstances there can be a charge for this.
3. Having inaccuracies corrected promptly.
4. Having information that we hold about you erased except where there is a statutory or legal requirement for us to collect process or hold it.
5. Restricting processing of your data except where there is a contractual, statutory or legal requirement to process it.
6. Data portability where relevant.
7. Intervention in respect of automated decision making (automated decision making is not operated within the Beachcroft).
8. Withdrawing consent (see below)
9. Complaining to the Information Commissioner's Office (ICO) (See below)

## Can I stop you holding and processing my data?

### Withdrawal of Consent

The lawful basis upon which the Beachcroft processes personal data is that it is necessary in order to comply with our legal and contractual obligations and in some cases the period that we must retain the data is set by law. Where there is no legal requirement set-down for Data retention we follow the industry best practice guidelines.

Where the Beachcroft processes personal data solely on the basis that you have consented to the processing, you will have the right to withdraw that consent.

**To exercise any of these rights you must in the first instance contact the Data Controller (DC) in writing or by email at the addresses on Page 1.**

**If you are unhappy with the way your request has been handled, you may wish to ask for a review of the DCs decision by challenging it in writing within 28 days. Reviews are conducted by our ICT Contractors who are registered DPO's.**

### **Complaints to the ICO**

If you are not content with the outcome of the review, you may apply directly to the Information Commissioner for a decision. Generally the ICO cannot make a decision unless you have exhausted our internal review procedure. The Information Commissioner can be contacted at:

The Information Commissioner's Office,  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF