

Best Western Beachcroft Hotel & Restaurant

Customer & Client Privacy Notice

The Best Western Beachcroft Hotel & Restaurant 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 at Reception.

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 the 25th May 2018 the General Data Protection Regulation (GDPR) will come into force and the current Data Protection Act (DPA) 1998 will be updated by a new Act giving effect to its provisions. Before that time the DPA will continue to apply.

This new regulation is 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.

Who are we?

Best Western Beachcroft Hotel & Restaurant

Beachcroft Hotels Ltd. – 5579118, Minerva House, Lower Bristol Road, Bath, BA2 9ER trading as the Best Western Beachcroft Hotel & Restaurant, Clyde Road, Felpham, Bognor Regis, West Sussex, PO22 7AH, for simplicity our Company will be referred to as “BWB” in the rest 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 A8269880, you can check our details on the ICO’s website.

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

By Email: proberts@beachcroft-hotel.co.uk

Or in writing to:

The Data Controller, Best Western Beachcroft Hotel & Restaurant, Clyde Rd., Felpham, Bognor Regis, West Sussex, PO22 7AH

Why do we need to hold and process your personal data?

The main reason that the BWB or our “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 very much value our relationship with our Customers, many of whom are regular visitors or users of our facilities, and we want to keep you informed of **Competitions, Events or Special Offers** that we have from time-to-time and to keep you in touch with developments at the BWB and Partner Hotels. We would therefore like to use your contact details to stay in touch, normally by Email but occasionally by telephone. **However, we will not do this without seeking your express consent.**

The BWB 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 BWB's 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 3rd Party, by any method, they will generally pass only limited Data to BWB, this may include the following information to allow us to fulfil your order:

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

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.

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 BWB 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 BWB for reasons of Security & Crime Prevention, this is a loop system which will not retain images for longer than 72 hours unless it has to be accessed for legal reasons. 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 BWB 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:

- Property Management System
- Best Western International
- Best Western GB
- MARCOM *Computing*

The Property Management System stores and manages booking information on our behalf and is not shared with

any other party. This Data is stored in a European Data Centre.

Best Western International (BWI) – This is a global brand that may store your data outside the EU where Privacy Laws and Law Enforcement Regulations may be different, you should only enter data into Best Western International Systems if you are happy with this. BWB is not linked to Best Western International.

Best Western GB (BWGB) – Pass Data regarding “*Loyalty Programmes*” to BWI and this may be stored outside the EU where Privacy Laws & Law Enforcement Regulations may be different.

Please note that BWI & BWGB are independent of BWB and the data collected for Loyalty Programs is not the responsibility of BWB.

MARCOM, our ICT provider monitors access to and usage of the Internet via the BWB Wi-Fi facility and associated connection systems to ensure legal compliance and prevent misuse. They do not pass this information to any 3rd Party unless required by law to do so, they may collect and store data including:

- IP Addresses.
- MAC Codes.
- Identifying names of devices.
- Browsing history.
- Bandwidth used.
- Logon times and location within BWB.

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 BWB 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 my rights regarding the data you hold about me?

Under GDPR (the new regulation) you have significantly enhanced 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 BWB).
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 BWB processes personal data is that it is necessary in order to comply with our legal and contractual obligations.

Where BWB 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.

Complaints to the ICO

If you are not content with the outcome of the internal 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