

# PRIVACY STATEMENT

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## PRIVACY POLICY

This site is owned and operated by 7 Hospitality Management (UK) Ltd. Your privacy is very important to us. We respect the privacy of every individual who visits this Web site or responds to this hotel's interactive advertisements. To help protect your privacy, we adhere to the following guidelines.

Note: This policy applies to 7 Hospitality Management and any of its managed properties within the company portfolio. This site contains links to other sites, some of them are our service providers, for example, our reservations booking engine. We are not responsible for the privacy practices or the content of such Websites. The following discloses our information gathering activities for this Website only.

## WHO COLLECTS MY DATA?

Your data is collected by 7 Hospitality Management, a limited company registered in Scotland under company number SC592311, whose registered and main trading address is Kingsway West, Dundee, DD2 5JT, and all of our managed properties. Where your stay is within a hotel operated under a franchise agreement with a hotel brand, your data will also be collected by the hotel brand e.g. Hilton Hotels & Resorts.

### 1. HOW IS YOUR PERSONAL DATA COLLECTED?

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

**Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

**Automated technologies or interactions.** As you interact with 7 Hospitality Management's and our properties websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties e.g. Google Analytics

### 2. WHEN DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal Information (PI) may be collected in certain circumstances as follows:

- Hotel enquires e.g. meeting rooms, wedding venue enquiries, bedrooms
- Arrival and departure
- Subscription to newsletters, to receive e-mail offers or promotions with explicit consent
- Participation in marketing schemes
- Filling in of an online collection form (e.g. online bookings, questionnaire, forms)

- Consumption during a stay in a hotel as tracked through room charges
- Booking of a hotel room - including brand and independent booking engines
- Use of a website managed by 7 Hospitality Management, including [www.7Hospitality.co.uk](http://www.7Hospitality.co.uk)
- Participation in guest feedback or surveys (e.g. "Make It Right", "Contact us", "Survey Monkey/Mail Chimp", "SALT Comments")
- Registering with loyalty programs
- Provision of information by third party service providers
- GDS and PMS reservation systems
- Connection to any 7 Hospitality Management websites (IP address, session cookies and Google Universal Analytics)
- Recruitment process
- Claims, legal disputes or hotel requests

### 3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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 collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes; name, title, date of birth, nationality, medical or health information
- **Contact Data** includes; billing address, delivery address, email address, telephone numbers and CVs
- **Financial Data** includes; bank account and payment card details
- **Transaction Data** includes; details about payments to and from you and other details of products and services you have purchased from us
- **Technical Data** includes; internet protocol (IP) address, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
- **Demographic Information** includes; postcode, preferences and interests
- **Profile Data** includes; purchases or orders made by you, preferences, feedback and survey responses, your interest e.g. preferred location of room (low floor, high floor), type of bed, preferred newspaper, sports and cultural interests
- **Usage Data** includes; information about how you use our website, products and services
- **Marketing and Communications Data** includes; your preferences in receiving marketing from us and our third parties and your communication preferences
- **Subscriptions** includes; membership card number from loyalty programs e.g Hilton Honors, 7 Health & Fitness

#### 4a. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
1) To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
2 ) To operate and deliver services	(a) Identity	(a) Performance of a contract with you
(a) Manage payments, fees and charges	(b) Contact	(b) Necessary for our legitimate interests (to recover debts due to us)
(b) Collect and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	
3 ) To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you
(a) Notifying you about changes to our terms or privacy policy	(c) Profile	(b) Necessary to comply with a legal obligation
(b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
4 ) To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you
(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)		
5 ) To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group

restructuring exercise)

(b) Necessary to comply with a legal obligation

<p>6 ) To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>7 ) To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>8 ) To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

#### 4b. OTHER WAYS IN WHICH WE MAY USE YOUR INFORMATION

- To book or reserve hotel rooms or venue hire
- Enquiring handling and service requests
- Internal record keeping
- Manage membership records
- Internal record keeping
- To maintain business records in compliance with local regulations
- Management of guests' complaints
- To track consumption e.g. telephone and bar
- To let you benefit from our loyalty program
- To comply with fraud prevention means

- We may send promotional emails about; special offers, hotel discounts, promotional invitations or other information which we think you may find interesting using the email address which you have provided but giving you the right to 'opt out' of such communications.

## **5. SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have 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.

## **6. SHARING OF YOUR PERSONAL INFORMATION**

At 7 Hospitality Management, we wish to offer you the same level of service and hospitality across all our managed hotels.

We will not share your data with third parties unless we are obliged to disclose personal data by law, or the disclosure of national security, taxation and criminal investigation, or we have your consent, and to the following.

These authorized individuals include (but are not limited to):

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice
- 7 Hospitality Management (UK) LTD employees
- Hotel reservation staff using 7 Hospitality Management reservation tools
- IT and Marketing teams
- Medical services
- Any relevant individuals of any 7 Hospitality Management operated hotels' legal entities for specific categories of data

## **7. USE OF COOKIES**

This website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of /saving of cookies on their computer / device.

What are cookies? Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors or use the cookie control system if available upon their first visit.

## **8. CONTROLLING YOUR PERSONAL INFORMATION**

You may choose to restrict the collection or use of your personal information or to change your mind about receiving marketing information by writing to or emailing us at:

7 Hospitality Management (UK) Ltd, Kingsway West, Dundee, DD2 5JT

conner.harvey@7hospitality.co.uk

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information which we hold about you under the Data Protection Act 2018. If you would like a copy of the information held on you please write to:

Head of Brand and Marketing  
7 Hospitality Management (UK) Ltd,  
Kingsway West, Dundee,  
DD2 5JT

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

## **9. QUESTIONS / CONTACT**

The full name of our company is 7 Hospitality Management (UK) Ltd. We are registered in Scotland under registration number SC592311. Our registered address is DoubleTree by Hilton Dundee, Kingsway West, Dundee, DD2 5JT. You can contact us by telephone on 01382 641122 asking for the marketing department. Our VAT number is 292 690 079.

If you have any questions about this Privacy Policy or how 7 Hospitality Management processes your PI in general, please contact us at the dedicated marketing department of 7 Hospitality Management, contactable on +44 (0) 1382 641122 or at Guest Data Services, Marketing Team, 7 Hospitality Management, Kingsway West, Dundee, Scotland, DD2 5JT.