

# SOUTHERNHAY HOUSE

## *Made in Exeter*

### OUR PRIVACY POLICY

This Policy applies to the entire contents of our website under the domain name [www.southernhayhouse.com](http://www.southernhayhouse.com) (the “Website”) and to any person using Southernhay House Hotel, its services and facilities.

This Privacy Policy and any correspondence is between “us” (Southernhay House Ltd of 36 Southernhay East, Exeter EX1 1NX Company number 07293950) and “you” the user of the Website and our services and facilities. “You” shall mean you and any third party that accesses the Website; someone who is not employed by us, is an individual or acting in the course of employment; that is 18 years old or older and capable of entering a contract.

We are committed to ensuring that your privacy is protected and understand the need for appropriate protection of all personal information provided by you to us.

By providing us with your personal information “Data” (as defined below), whether through the Website or in person, you consent, agree and accept that we may collect, use, disclose and share among ourselves your personal Data as described in this Privacy Policy.

Please read this Privacy Policy carefully. By continuing to use the Website or using our services you are confirming that you accept this Privacy Policy and our [Terms and Conditions](#). If you do not accept this Privacy Policy or Terms and Conditions, you must leave the Website and cease using our services immediately.

### WHAT DATA DO WE COLLECT ABOUT YOU?

We collect data from you when you make a booking, use our facilities or our services, via our team, either in person or over the phone, and also when you book online via our Website.

We also collect data when you connect using our social media websites.

We also collect Data from you when you subscribe to any of our marketing communications, complete any voluntary customer surveys, enter our competitions or provide feedback. These may be carried out online, by telephone or in person.

Some of the Data we collect may be classed as personal Data, that is, it is information about an individual who can be identified from it. It may be collected any time you submit it to us, whatever the reason may be.

Without limitation, any of the following “Data”; (meaning collectively all information that you submit to the Website, including but limited to, personal details and information submitted using any of our services, as provided on the Website), may be collected by us via our Website including:

- a) Your full name;
- b) Your contact information such as email addresses and telephone/mobile numbers;
- c) Your demographic information such as preferences and interests;
- d) Your geographic information such as home address and post code (where applicable);
- f) Your IP address (automatically collected);
- g) Your web browser type and version (automatically collected);
- h) Your operating system (automatically collected);
- i) Your credit or debit card details where you make a payment
- j) A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected); and
- k) Your Cookie information (see below).

We store credit and debit card detail when bookings are taken online for both pre-authorisation and payment, these are facilitated via a third party called Guestline via their system PCI Lynx. Their privacy policy can be found here <https://www.guestline.com/contact/legal.html>. If you do not agree with their privacy policy then do not purchase our services.

If you choose to connect with us via social media websites, for example such as Facebook or Instagram, we may collect your user name, (which may contain your name and surname) by you “liking” or “following” our page. We may also run competitions via these social media websites which will send you to a separate competition website link. By connecting with us via social media websites you are bound by their terms and conditions and privacy policies.

If you provide us with any personal Data relating to any third party (e.g. information about your spouse, children, employees or colleagues) for particular purposes, by submitting such information to us, you warrant and represent to us that you have obtained the consent of such third party to provide us with their personal Data for the respective purposes.

## HOW WILL WE USE THE DATA ABOUT YOU?

We use the information we collect about you to;

- process your bookings and accommodation;
- answer your queries; and
- provide our food and beverage facilities and services.

With your consent, we may contact you via our marketing and sales channels (via email, phone or post) about other related products and services we provide which we think may be of interest to you. Our marketing communications are generally sent by email but we may sometimes use other methods of delivery such as by post or SMS. At any time you may stop these communications by texting “STOP” or unsubscribing.

We may use your Data collected from the Website to personalise your visits to our Website or the Hotel.

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience. Specifically, we may use Data for the following reasons:

- a) internal record keeping;
- b) improvement of our offers, products and Website;
- d) transmission by email of promotional materials that may be of interest to you;
- e) to pass on to the police and government authorities as requested by them, for example in cases of fraud and theft.
- f) to comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on us; and
- g) linking you with third party payment collecting company for payments.

We sometimes engage the services of trusted third parties to process the Data collected by generating anonymised statistics to assist us with our business analysis. We do not disclose this anonymised Data to any third parties. It is not possible for the business to identify an individual from such anonymised Data presented in our internal reports.

We adhere to the following working principles:

- access to Data is restricted to our relevant staff members.
- any Data disclosed to a third party is anonymous and you cannot be identified by it, save for payment details where we use a third party payment collecting company.

- all hard copies of Data and confidential documents are kept securely under lock and key.

We have registered with the ICO under the Data Protection Act 1998 and adhere to the following principles:

- All our relevant employees have received training in how to handle Data. This includes ensuring they are aware of the importance of handling Data safely and securely, and understanding the procedures in place to ensure this happens.
- When collecting Data for third party clients all Data is anonymised, save for payment details where we use a third party payment collecting company Worldpay.
- Once every year we will evaluate our database and securely delete any contacts no longer engaged or any Data no longer needed by us.
- We have measures in place to keep the personal Data we hold safe and secure.
- All personal information is stored in our secure web server hosted site to which access is only granted to key personnel. Where data is downloaded to be updated, and as a backup to the cloud, it is only stored on personal drives, only accessible via individual log in.
- The Data Processor and the Data Controller (both, Sally French) can be contacted at [home@southernhayhouse.com](mailto:home@southernhayhouse.com) - please put the topic of your enquiry in the header title.
- The Data Controller acknowledges possible recipients of your Data include: our employees, agents, consultants, third parties and data processors.

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website and our services. Specifically, Data may be used by us for the following reasons:

- internal record keeping;
- improvement of our products, services and Website;
- transmission by email of promotional materials that may be of interest to you;
- to pass on to the police and government authorities as requested by them, for example in cases of fraud and theft.
- linking you with third party payment collecting company for payments; and

## DATA SHARING

Where we use contracted and trusted third parties to facilitate our provision of services and offers, we will also share your Data with those parties for that purpose. This includes the

processing and delivery of marketing communications to you, processing review and upgrade services and any other third party services engaged to perform payment, business support, operational or administrative function.

All Data is processed within the UK.

Third parties are subject to confidentiality obligations and may only use your personal Data to perform the necessary functions as requested by us and not for any other purposes.

Save as listed in this Privacy Policy, we do not share your Data with any third parties outside of the above processing arrangements and we do not share your Data with any other business. From the Data we collect, you should only ever receive marketing communications from Southernhay House Hotel.

We may also disclose personal Data as permitted or required by law. For instance, if asked by the police or HMRC, we may share your personal Data with them for the purposes of prevention and detection of crime.

## TRANSACTION AND DATA SECURITY

Whilst we take reasonable, appropriate technical and organisational measures to safeguard the personal Data that you provide to us, no transmission over the internet can ever be totally guaranteed secure. Consequently, please be aware that we cannot guarantee the complete security of any personal Data that you transfer over the internet to us whilst in transit. Sending such information is entirely at your own risk.

We understand how important it is to securely store any Data that you provide. We take the privacy and security of your payment and personal details very seriously. Although we take reasonable care to keep your personal Data secure, we cannot be held liable for any loss you may suffer from unauthorised access or loss of any Data provided.

As part of our security measures, we use encryption technologies for online transactions via our Website.

Where you make a payment in person at our reception we use the secure third party payment called Worldpay. Please see their privacy policy here <https://business.worldpay.com/privacy>. If you do not agree with their privacy policy then do not purchase our services.

If you choose to use our guest Wi-Fi to access websites or content provided by third parties or purchase products from, then your personal information may be available to the third party provider. The way third parties handle and use your personal information related to the use of their services is governed by their privacy policies. We have no responsibility for third parties privacy policies or third parties' compliance with them. Our guest wireless systems use radio

channels or local area networks to transmit voice and data communication information; privacy therefore cannot be guaranteed, and we shall not be liable to you for any lack of privacy you experience while using the service.

It is important that you take note of our cancellation policy in our Terms and Conditions we reserve the right to charge and take payment from your card for a “no-show” should you fail to turn up for your stay and have not let us know by the agreed time period in advance of arrival.

In addition to the Data collected via our Website when we collect Data in person we keep this information in secure files with restricted access to keys.

## MARKETING

We would like to send you information about Southernhay House Hotel, its offers and services, which we believe may be of interest to you. If you have consented to receive our marketing, you may opt out at any time.

If you no longer wish to be contacted, you can unsubscribe by any of the following methods:

- Select the UNSUBSCRIBE link included in our emails or on our Website;
- Contact our Sally French on the email address: [home@southernhayhouse.com](mailto:home@southernhayhouse.com) and the subject matter in the email header.

## ACCESSING AND AMENDING YOUR DATA

You have a right to access a copy of the Data that we hold about you. If you would like to do this, please email us at [home@southernhayhouse.com](mailto:home@southernhayhouse.com) and the subject matter in the email header or write to us at the address above. Upon payment of a ten pound (£10) admin fee, as per the terms of the Data Protection Act, we will provide the Data within thirty (30) days of receipt of your written request.

We want to make sure that your personal Data is accurate and up to date.

You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.

You are able to make amendments, or withdraw your consent for use, by telling our reception staff when you check in or by contacting our Data Processor via email at [home@southernhayhouse.com](mailto:home@southernhayhouse.com) and the subject matter “Opt-out” in the email header.

If you withdraw your consent to any or all use of your personal Data, depending upon the nature of your request, we may not be able to provide or continue providing our products and services to you, or administer any contractual relationship already in place. You understand and agree that in such instances where we require your personal Data to fulfill a contractual obligation to you and

you withdraw your consent to collect, use or disclose the relevant personal Data for those purposes, we cannot be held liable for breach of that agreement. Our legal rights and remedies in such event are expressly reserved.

#### RETENTION OF INFORMATION

Your personal Data will be retained for as long as it is necessary to fulfill the purpose for which it is collected, for business or legal purposes, or in accordance with applicable laws.

Should you choose to unsubscribe from our mailing list, please note that your personal Data may still be retained on our database for up to 12 months or to the extent permitted by law.

#### LINKS TO OTHER WEBSITES

This Privacy Policy applies solely to Data collected by us. Our Website may contain links to external sites, operated by other owners and third parties, over which we have no control. For this reason, we encourage our visitors to be aware when they leave our Website to read their privacy policy applicable. Any access to such other websites or pages is entirely at your own risk. We are not responsible for the privacy policies, content or security of any third party websites linked to our Website.

#### CHANGES TO OUR PRIVACY POLICY

This Privacy Policy is regularly reviewed. Following any changes, the new version of the policy will be uploaded to our Website and the old version removed. Please check back frequently to see any updates. This was updated last in April 2018.