

PRIVACY POLICY

Who We Are

We, Grand Harbour Hotel Trading Ltd, gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Grand Harbour Hotel Trading Ltd's registered office is at 1 Hill House, Little New Street, London, EC4A 3TR and we are a company registered in England and Wales under company number **0743 0023**. We are registered on the Information Commissioner's Office Register; registration number **ZA149280**, and act as the data controller when processing your data. We have a designated Data Protection Appointed Person, who can be contacted at 5 West Quay Road, Southampton, SO15 1AG – telephone number +44 2380 633033.

Also, please note that this statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organise or offer packaged travel arrangements, marketing partners or corporate customers.

Information That We Collect

Grand Harbour Hotel Trading Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

Personal information collected by us

Through all aspects of your guest journey to us and when you are with us we may take the opportunity to collect various information from you. This personal information may include:

West Quay Road
Southampton
SO15 1AG

T: 023 8063 3033
F: 023 8063 3066
W: grandharbourhotel.co.uk
grandharbour@grandharbourhotel.co.uk

- Your contact information
- Information related to your reservation, stay or visit to us
- Participation in a membership or loyalty program in conjunction with your stay with us
- Participation in a sweepstakes or marketing program
- Information related to the purchase and receipt of products or services
- Personal characteristics, nationality, income, passport number and date and place of issue
- Travel history
- Payment information
- Guest preferences
- Marketing and communication preferences
- Information about vehicles you may bring onto our property
- Reviews and opinions about our property (if they are identified or associated with you)
- Frequent flyer or travel partner program affiliation and member number
- Hotel, airline and rental car packages booked
- Groups with which you are associated for stays at hotels
- Information needed to administer any affiliated reward program and profiles, including transaction and correspondence details
- Information provided on membership and account applications

We may also record details on joint travellers, including their names and frequent flyer numbers, and the age of the driver of the rental car. We may also collect and keep information and records related to conversations, including recording, or monitoring customer service calls.

In addition we collect other personal information in certain cases, such as:

- Surveys: We may request demographic data or other personal information in customer surveys direct or through a nominated Survey collection company
- On-property Collection: Local laws may require that we collect additional personal information during registration/check-in at our properties. We use CCTV and other security measures at our property that may capture or record images of guests, visitors in public areas, and information related to your location while on our properties via keycards and other technologies. We may also use other technologies that record sound or video to protect our staff. In addition, we may collect personal information in connection with on-property services, such as concierge services, health clubs, spas, activities, and equipment rental
- Event Profiles: If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organisation (name, annual budget, and number of sponsored events per year).

- We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event. If you visit us as part of an event, we may share personal information about you with the event planners so they may include you as part of the event. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you
- Social Media: If you choose to participate in Hotel sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. You should understand that you may be subject to the terms and conditions and any privacy policies of the social media site and that the Grand Harbour Hotel is not responsible for your activities on social media sites
- Employment Applications: If you choose to apply online for employment with the Grand Harbour Hotel, please see our Applicant Privacy Notice.

Personal Information We Collect from Third Parties

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we receive. (See below for more details about "Other Information.") We may also collect information about you from third parties, including information from our airline, credit card, and other partners, information from social media sites consistent with your settings on such sites, such as social media sign-on programs, and from third-party sources. We may append this information to the information we have on file for you and share it with others consistent with this Statement.

Use of Personal Information Collected About You

We use your personal information to provide the services you request from The Grand Harbour Hotel, or which are part of a program you have joined or a purchase you have made. We also use your personal information to provide you with information about meeting and event planning and access to specific account information for administrative purposes. In addition, we may use your information to:

- Improve the Grand Harbour Hotels services
- Provide you with the expected level of hospitality; ensure our site, products and services are of interest to you
- Process enrolments and applications; and facilitate collections

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We also use the information to provide or offer you newsletters, promotions and featured specials, other marketing communications, product or service awareness marketing, to conduct surveys, sweepstakes, prize draws, and other contests, and in connection with our Associated rewards programme organisers. (App and Digital Key functionality where available). We may provide these communications online, via email, telephone, mobile/text messaging (including SMS and MMS) and postal mail. We may also aggregate your personal information with data from third-party sources for purposes of data hygiene and analytics.

eFolio Program: In order to provide the most efficient service, we encourage you to receive your hotel bill via email ("eFolio"). All guests will be automatically enrolled in this program. However, you can choose to receive a paper receipt by making such request upon check-in or at any time during your stay prior to your departure date. The email address you provided upon making your reservation. If you would like your eFolio to be sent to a different email address, you can make that request upon check-in or at any time during your stay prior to your departure date. Further, we do not have any mechanism for verifying your email address, so it is your responsibility to ensure that we have the correct (and preferred) email address for you. If you make a reservation for another person and use your email address, your email address will be used to provide their receipt.

How We Share Personal Information

- **Electronic Billing Program:** If you participate in a corporate electronic billing program or the eFolio program, billing information will be shared with the credit card provider and if you use a corporate credit card, possibly, your employer
- **Group Events or Meetings:** If you visit The Grand Harbour Hotel as part of a group event or meeting, information collected for meeting and event planning may be shared with the organisers of those meetings and events, and, where appropriate, guests who organise or participate in the meeting or event
- **Business Partners:** From time to time we may partner with other companies to provide products or services and may share your information with our business partners to provide those products or services to you. For example, we may help to arrange rental car or other services from our business partners, and share personal information with our business partners in order to provide those services. If you are a member of an associated rewards scheme Partner, we may share your personal information with our business partners in order to credit you with mileage or other benefits earned through your participation in this program
- **Co-Sponsors of Promotions:** We also may co-sponsor promotions, sweepstakes, prize draws, competitions or contests with other companies, or we may provide prizes for sweepstakes and contests sponsored by other companies. If you enter one of these sweepstakes or contests, we may share your information with our co-sponsor or the third-party sponsor

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- On-property Services: We may share personal information with providers of on-property services that provide services such as concierge services, spa treatments, or dining experiences
- Service Providers: We rely on service providers to provide certain products and services, such as to facilitate administrative functions and information technology operations, credit card billing, reservations services, administering the associated rewards program, providing services in connection with our websites, including airline and rental car packages; communicating news and delivering promotional and transactional materials via email, direct mail, and online and mobile advertising; processing credit card transactions, data hygiene and enhancement services; professional services such as accounting, auditing and legal advice; investigating accident reports; processing insurance claims; and administering sweepstakes, prize draws, competitions and customer surveys. The Grand Harbour Hotel will disclose personal information to service providers as appropriate
- Business Transactions: As we develop our business, we might sell, buy, restructure or reorganize businesses or assets. In the event of a merger, consolidation, sale, liquidation or transfer of assets, The Grand Harbour Hotel may, in its sole and absolute discretion, transfer, sell or assign information collected, including, without limitation, Other Information and personal information, to one or more affiliated or unaffiliated third parties
- Telemarketing: If you stay at the Grand Harbour Hotel, we may share your telephone number with any contracted company working on behalf of the hotel, for purposes of telemarketing in regards to the goods and services we supply as a hotel. We may also receive your telephone number from our partners or from other sources, which we may use for telemarketing purposes
- Other: In addition, the Grand Harbour Hotel may disclose personal information in order to:
 - (i) comply with applicable laws
 - (ii) respond to governmental inquiries or requests from public authorities
 - (iii) comply with valid legal process
 - (iv) protect the rights, privacy, safety or property of The Grand harbour Hotel, site visitors, guests, employees or the public
 - (v) permit us to pursue available remedies or limit the damages that we may sustain, (vi) enforce our websites' terms and conditions
 - (vii) respond to an emergency

Safeguarding Measures

- Grand Harbour Hotel takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, **including**: -
- High level security firewalls, complete network separation, data encryption, threat detection and response probes, enterprise level of antivirus and antimalware application. Multiple security related group policy objects have been implemented preventing use of any removable storage media and enhancing client desktop and laptop security.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Grand Harbour Hotel does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Grand Harbour Hotel, however, as this information is required for us to provide you with our services we will not be able to offer some/all our services without it.

How Long We Keep Your Data

Grand Harbour Hotel only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. Data retention is in line with statutory requirements in the UK. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Other Information

When you visit and interact with this site, The Grand Harbour Hotel and third parties with whom The Grand Harbour Hotel has contracted to provide services to the Grand Harbour Hotel, may collect Other Information (for example, a catalog of the site pages you visit, and the number of visits to our sites). We use cookies and other technologies to collect this information (please see our [Cookies Statement](#)). At this time, we do not respond to "do not track" signals or other mechanisms.

We may also aggregate or anonymise personal information (for example, we may aggregate personal information to calculate the percentage of our users who have a particular telephone area code) or collect demographic data such as date of birth, gender, and marital status.

Because Other Information does not personally identify you, such information may be disclosed for any purpose. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

Sensitive Information

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership. We do not generally collect sensitive information unless it is volunteered by you. We may use health data provided by you to serve you better and meet your particular needs.

Personal Information from Children

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

Links to Third-Party Websites

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties.

Other third-party websites include the landing page of the high-speed Internet providers at our hotel, as well as social media sites (such as Facebook and Twitter) on which our property may have accounts or fan pages where you may be able to post information and materials.

If you provide information on third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Protecting Personal Information

The Grand Harbour Hotel will take reasonable measures to:

- (i) protect personal information from unauthorized access, disclosure, alteration or destruction
- (ii) keep personal information accurate and up-to-date as appropriate

We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technology to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

For your own privacy protection, we encourage you not to include sensitive personal information in any emails you send to us. Please do not send credit card numbers or any sensitive personal information to us via email.

We will not contact you by mobile/text messaging or email to ask for your confidential personal information or credit card details. We will only ask for your confidential personal information or credit card details by telephone when you are booking a reservation or event.

Changing and Accessing Your Personal Information

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, request that we update, correct and/or suppress personal information about you that we maintain in our active database. We will make all required updates and changes within the time specified by applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. Such requests must be submitted in writing to the following address: The Grand Harbour Hotel, West Quay Road, Southampton SO15 1AG. To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. Please remember that if you make such a request, we may not be able to provide you with the same quality and variety of services to which you are accustomed.

In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or that the Grand Harbour Hotel cease using personal information about you on the grounds that such personal information was acquired by unjust means or used in violation of law by sending your written request to The Grand Harbour Hotel, West Quay Road, Southampton SO15 1AG. We will seek to honour those requests consistently with applicable law.

Retaining Personal Information

We retain personal information about you for the period necessary to fulfil the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law.

Choices – Marketing Communications

If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you about our products and services or invite you to events by email, telephone, mobile/text messaging (including SMS and MMS) or post.

If you are a member of our associated rewards club, you may receive additional communications from us, including third-party news and offers specifically for Reward Club program members, and co-branded messages from our business partners. Please note, however, that if you change the communications you receive from us as described above, we will not be able to remove your personal information from the databases of affiliates, franchisees or business partners with whom we have already shared your personal information (i.e., to whom we have already provided your personal information as of the date of your opt-out request).

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email you receive from us. Opt-out requests can take up to ten business days to be effective.

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Lodging A Complaint

Grand Harbour Hotel Trading Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Data Protection Appointed Person

5 West Quay Road

Southampton

SO15 1AG

Tel:- +44 2380 633033.

Information Commissioners Office

Wycliffe House, Water Lane

Wimslow

SK9 5AF

Tel: 0303 123 1113