

Privacy Policy for Danesfield House Hotel Ltd

This Privacy Policy applies to information held about clients, prospective clients and users of the services and facilities provided by us (and our subsidiaries) including, but not limited to, Danesfield House Hotel & Spa, Illuminata Danesfield, and Spa Illuminata Mayfair (including the restaurant, spa treatments and guest Wi-Fi). This Privacy Policy also applies to suppliers and prospective suppliers, contacts and all other persons about whom we hold information. For the avoidance of doubt this Privacy Policy does not apply to our employees. By 'information', we mean personal information about you that we collect, use, share and store.

In this Privacy Policy, "we," "us," and "our" means Danesfield House Hotel Ltd, a company registered in England and Wales with No. 2999930, registered office at Henley Rd, Marlow, Buckinghamshire SL7 2EY, and "you" means the individual to whom the information relates. We are the data controller and we operate our websites www.danesfieldhouse.co.uk & www.spailluminata.com (collectively & individually the 'Website').

In this Privacy Policy, "personal data" means information about an individual who can be identified from it as defined by Data Protection Legislation. We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data.

The Website is not intended for children and we do not knowingly collect data relating to children.

"Data Protection Legislation" means the EU General Data Protection Regulation 2016/679 and the Data Protection Act 2018; together with all other applicable legislation relating to privacy or data protection.

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.

Please read this Privacy Policy carefully to understand our views and practices regarding your information and how we will treat it.

HOW DO WE COLLECT PERSONAL DATA FROM 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 fill in our spa treatment forms or guest forms.

We have CCTV installed in Spa Illuminata Danesfield House.

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

If you choose to connect with us via social media websites, for example Facebook, Instagram and Twitter, 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.

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.

We store credit card and debit card details when bookings are taken online for both pre-authorisation and payment, and these are facilitated via third party payment processors.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

Without limitation, any of the following personal data, may be collected by us via our Website including:

- a) Your full name;
- b) Your contact information such as email address and telephone number;
- c) Your demographic information such as preferences and interests;
- d) Your geographic information such as home address and post code (where applicable);
- e) Your date of birth;
- 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);
- k) Your car registration;
- l) Your passport or driving licence details;
- m) Your special dietary requirements;
- n) Your Cookie information (see below).

In addition, the following personal data will be collected when you fill in our Spa treatment applications or guest forms:

- a) Your full name;
- b) The name of your partner or spouse;
- c) The name of your children;
- d) Your date of birth;
- e) Your contact information such as email address and telephone number;
- f) Your demographic information;
- g) Your geographical information such as home address and post code (where applicable);
- h) Your special dietary requirements;
- i) Your credit or debit card details where you make a payment;
- j) Your medical history;
- k) Your physical health;
- l) Your car registration;
- m) Your passport or driving licence details.

The personal data we collect includes so called 'sensitive' or 'special categories' of personal data, such as details about your health, religion or ethnicity (for example in our spa treatment applications or guest forms). Where reasonably practicable, we will usually seek separate permission from you in writing to process these special categories of personal data.

HOW WILL WE USE THE DATA ABOUT YOU?

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customised experience. We may also use the information that you have provided to ensure that the content on our website is presented in the most effective manner for you and your computer.

Specifically, we use the information we collect about you to: Process your bookings and accommodation;

- Answer your queries;
- Process your voucher purchases;
- Provide our food and beverage facilities and services;
- Provide our spa treatment and services;
- Provide you with the best possible service and experience;
- Keep internal records;
- Improve our offers and products;
- Improve, customise, update and personalise our Website to improve your experience;
- Link you to third parties that are offering services you may require;
- Send you our newsletter or updates, or to make suggestions and recommendations to you and other users of our site about services that may interest you or them; and provide you or them with targeted marketing in relation to our services (unless you indicate at any time that you or they do not wish us to do so – see the marketing section below);
- Pass on information to the police and government authorities as requested by them, for example in cases of fraud or theft;
- Comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on us;
- Link you with third party payment providers for payments;
- Contact you for market research purposes which may be done using email, telephone or post.

LAWFUL GROUNDS FOR USING YOUR PERSONAL INFORMATION

The law permits us to process your personal data because:

- You have given consent to the processing of such information for a specific reason;
- The processing is necessary for the purposes of the legitimate interests that we pursue, which might be:
 - to run and administer our business;
 - to discharge our legal obligations;
 - to store and disclose information where necessary;
 - to provide, evaluate, develop and improve our services;
 - to improve our website;
 - to keep our website safe and secure;
 - to prevent fraud;
 - to protect our business interests;
 - to ensure that complaints are investigated; or
 - to keep you informed about relevant services;

- The processing is necessary for the performance of our contract to provide you with the products and services you have purchased; and/or
- the processing is necessary in order to comply with a legal obligation to which we are subject.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that personal data; (ii) you have made the personal data manifestly public; or (iii) the processing is necessary for the establishment, exercise or defence of legal claims. Where you have consented to our processing of such special categories of personal data you may withdraw such consent at any time, by contacting us at DP@danefieldhouse.co.uk, however please be aware if you withdraw such consent we may be unable to provide you with our services.

DATA SHARING

We keep all information confidential. However, in order to provide our services to the best of our ability, we may share any information with our agents, advisers, contractors, and support service or data providers, wherever located. The specific kind of information we share will depend on the context of your interactions with us, and the services you use. Third parties are subject to confidentiality obligations and may only use your personal data to perform necessary functions as requested by us and not for any other purposes.

Accordingly, your personal information may be shared with the following parties insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Privacy Policy:

The Danesfield House network of companies;

- The representative or travel advisor that has supplied us with your personal information (for example, your travel agent, personal assistant, employer or spouse who has provided us with your details);
- Third party services engaged to perform or assist us with marketing campaigns, business analysis, payment, business support, operational or administrative functions;
- Any other trusted business partners and suppliers;
- Our advisers;
- Third parties not affiliated with us if we have a good-faith belief that it is reasonably necessary to: (1) meet any applicable law, regulation, legal process or enforceable governmental request; (2) enforce applicable terms of service, including investigation of potential breaches; (3) detect, prevent, or otherwise address fraud, security or technical issues; and (4) protect against harm to the rights, property or safety of Danesfield House, our users or the public as required or permitted by law; and
- To any third parties to the extent necessary with respect to a sale of all or part of our business operations or assets.

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

Save as listed in this Privacy Policy, we do not share your personal data with any third parties outside of the above processing arrangements. From the data we collect, you should only ever receive marketing communications from our own brand.

[TRANSFERRING INFORMATION OUTSIDE THE UK

Where reasonably possible all personal data is processed within the UK. Data that you submit via our website is sent to and stored on secure servers owned by or operated for us. Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") to a country not deemed to provide adequate protection of your information by the European Commission, and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors. Such transfers may be made in order to improve the Site or to assist in our security or fraud protection activities.

When we, or our permitted third parties, transfer your information outside the EEA, we or they will impose contractual obligations on the recipients of that data to protect your information to the standard required in the EEA. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. We do not generally rely on your consent as the legal basis for transferring your personal data to outside the EEA, however where we feel it is necessary or appropriate we may seek to rely on your consent as the legal basis for such processing. Where we do, you may withdraw your consent at any time by contacting us in the way described below.

TRANSACTION AND DATA SECURITY

We adhere to the following principles:

- Access to personal data for our third party clients' is restricted to our relevant staff members;
- All hard copies of personal data and confidential documents are kept securely under lock and key;
- All our relevant employees have received training in how to handle personal data. This includes ensuring they are aware of the importance of handling personal data safely and securely and understanding the procedures in place to ensure this happens.

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. Our guest Wifi service is provided by a contracted trusted third party called Southern Communications (you can access their website [here](#) and their privacy policy [here](#)).

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.

YOUR RIGHTS

At any time, you have the right:

- to request access to or a copy of any information which we hold about you;
- to rectification of your information, if you consider that it is inaccurate;
- to ask us to delete your information, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your information (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending you marketing messages as described below in the marketing section;
- to restrict processing of your information;
- to data portability (moving some of your information elsewhere) in certain circumstances;
- to object to your information being processed in certain circumstances; and
- not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your information.

Any request for access to or a copy of your information must be in writing (please email us at DP@danefieldhouse.co.uk and include the subject matter in the email header) and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

We want to make sure that your personal data is accurate and up to date. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change.

You are able to make amendments, or withdraw your consent for use, by telling our reception staff when you check in or by contacting us using the details below.

MARKETING

We would like to send you information about Danesfield House Hotel Ltd products, offers and services, which we believe may be of interest to you.

If you do not wish to be contacted for these purposes, you can unsubscribe at any time by any of the following methods:

- Select the UNSUBSCRIBE link included in the emails or on our Website.
- Contact our Marketing Team on the email address: marketing@danefieldhouse.co.uk or DP@danefieldhouse.co.uk and with "URGENT – UNSUBSCRIBE REQUEST" in the subject line.

RETENTION OF INFORMATION

Your personal data will be retained for as long as it is necessary to fulfil the purpose for which it is collected, for business or legal purposes, or in accordance with applicable laws. Once every year we evaluate our database and securely delete any contacts no longer engaged or any personal data no longer needed by us.

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.

COOKIES

We may set access Cookies on your “computer” meaning any computer, laptop, tablet, mobile or other device that the Website can be viewed on.

A “Cookie” is a small file of letters and numbers which asks permission from your browser to be placed on your Computer’s hard drive. Cookies allow web applications to respond to you as an individual and allow us to distinguish you from other users on our Website. The web application can tailor its operation to your needs, likes and dislikes by gathering and remembering information about your preferences and allows us to improve our Website.

Our Cookies use:

- a) Google Analytics Cookies to identify which pages are being used. This helps us analyse data about web traffic (the number of visitors and how visitors move around our Website when they are using it) and improve our Website in order to tailor it to your needs.
- b) Third party Cookies within email campaigns predominantly sent using third party email marketing tools, as well as Google Analytics. Cookies are used to monitor open rates and improve your experience and also for the tracking of website activity initiated from the hyperlinks within email marketing campaigns.
- c) Session Cookies on our Website. These are temporary Cookies which only exist in the period you access the website (or more strictly, until you close the browser after accessing the Website). Session Cookies help the Website remember what you chose on the previous page, therefore avoiding having to re-enter information.
- d) Cookies used for customer email, customer name, customer id*, token*, customer profile link*, customer flags* (*=these are generated by our system) and social media sharing.

The length of time a Cookie will remain on your Computer will depend on the type of Cookie. On our Website, these Cookies do not contain personal information, and cannot be used to identify you.

To find out more about how to manage cookies through your chosen browser go to www.allaboutcookie.org/manage-cookies/.

You may delete/disable your Cookies or manage your cookies preference (Please see the link on how to disable Cookies <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>). If you do decide to disable or delete the Cookies altogether our Website will not work as well as it could as it relies on Cookies to provide you with the service you have requested.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser on your computer and search for “Cookies”.

PHISHING

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user, in an attempt to get the user to send private information that will be used for criminal activities such as identity theft and fraud.

Save where you are sending us your signed contract, such as treatment or booking form via email, we will never separately ask you to confirm any account or credit card tails via email. If you receive an email claiming to be from us asking you to do so, please ignore it and do not respond. You can contact our reception staff by phone or when you check in or by contacting us via email at

DP@danefieldhouse.co.uk and the subject matter "Credit Card Fraud" in the email header to report it or if you are unsure.

We will, on occasion, take bookings over the phone. We will give you our name and name of our company when we do this. If you are anxious about the phone call, revealing your payment details or do not believe that the person on the other end of the phone is us, we suggest you put the phone down and ring us directly using the telephone number on our Website asking for the person you spoke to.

LINKS TO OTHER WEBSITES

This Privacy Policy applies solely to data collected by us. Our Website contains links to external sites (such as social media), operated by other owners and their parties, over which we have no control. You should check the privacy policies on these sites before providing any personal information. 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 their party websites to which links are provided.

Certain features of the Site will allow for social networking. You should ensure when using these features that you do not submit any personal data that you do not want to be sent, collected or used by other users, such as profile details or e-mail address.

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 in June 2018.

HAVE A QUESTION?

Any questions on the Privacy Policy please email DP@danefieldhouse.co.uk and include the subject matter in the email header.

If you have any concerns about our use of your information, you also have the right (as a UK resident) to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.