## **INSTRUCTIONS FOR HOTEL:**

Please review this entire text and amend it as required so that it correctly describes your Privacy Policy for your website including online reservations and, if applicable, online voucher purchase.

- Please review all the highlighted text and fill in your details
- If online voucher purchase does not apply on your website, then please delete all highlighted references to it.
- Please review the section "How long will we keep your data for?" and amend it so that it describes your own policy correctly.
- Please review the section "*What Cookies are used on the website?*" and add in to the list any other Cookies that are in use on your website.

# **Privacy Policy**

## 1. Legal Information for hotel name

Address for the Hotel: address Company Name: company name VAT Number: VAT number Contact Phone No. / Email Address: phone / email address Data Protection contact details: email address

## 2. Privacy Policy

This privacy statement refers to our website and online reservations process and online voucher purchase. Any personal information which you provide to us will be treated with appropriate standards of security and confidentiality and in accordance with the General Data Protection Regulation 2016/679 and associated national legislation.

On what legal basis do we collect and process information about you?

- If you are making an online reservation or an online voucher purchase, we collect and process information about you based on our contractual obligation to perform those processes.
- All other information that is not necessary for the performance of the online reservation
  process or online voucher purchase process shall be collected and or processed on the basis
  of consent i.e. your explicit consent will be requested and you have the right to either agree or
  disagree to provide us with that information. For example, we shall only place you on our
  mailing list if you subscribe to it.

## Secure Online Reservations

 If you decide to make an online reservation on our website, you will be linked to a Booking Engine provided by our partner, Bookassist. All information is sent securely and is protected against disclosure to third parties. Bookassist is certified as compliant with PCI DSS (Payment Card Industry Data Security Standards). Bookassist's Security & Privacy Policy may be read here: <u>https://www.bookassist.com/global/security.jsp</u>

## Why do we collect information?

- Information is collected in order to facilitate the online reservation process, to facilitate the purchase of vouchers online, to offer additional services to you where you consent to such offers and/or to help us improve this process for your future use.
- Where you have subscribed to our mailing list, such information is collected in order to keep you informed on news and special offers.

What information do we collect about you?

- In order to carry out the online reservation process we require all the information marked with the asterisk including your name, address, phone number, email address and the credit card details that shall be used to pay for the accommodation. We will collect any other reservation data you may choose to provide, for example details of special requirements.
- During the online reservation process, we will ask for your consent to use your contact details for purposes other than in relation to your reservation, for example for special offers or other communications.
- Where you have subscribed to our mailing list, we collect your name and email address to keep you informed of special offers or other news.
- In order to carry out the online voucher purchase we require all the information marked with the asterisk including your name, address, phone number, email address, recipient name and the credit card details. We will collect any other data you may choose to provide, including address details and a message for the recipient.
- On the website and during the online reservation process and online voucher purchase, we may collect Cookies. Please see details of our Cookies Policy below.

## What if you do not want to provide your personal data?

- If you do not wish to provide data that is required for the online reservation process or online voucher purchase process, as symbolised by the asterisk, then you will not be able to proceed with the respective process and we advise that you contact us directly.
- If you do not wish to provide data during the online reservation process or online voucher purchase process that is not required, i.e. that does not have an asterisk beside it, then you may choose to not provide such information and this shall not impact upon the process.
- If you do not wish to provide information that is requested for services other than for the reservation process, i.e. signing up for newsletters or special offers, then you will not be able to benefit from those services but it will in no way impact upon the reservation process. If you provide consent initially and no longer wish to receive those services, you may withdraw consent at any time by unsubscribing and or contacting our Data Protection Officer, see contact details above.
- If you do not wish for us to collect Cookie information please see our Cookie Policy below for further details.

## How do we use the information?

- To complete or support an activity, i.e. the online reservation process or online voucher purchase process.
- Where you have subscribed to our mailing list, or where you have consented during the online reservation process to be contacted in the future other than in direct connection with your reservation, we may send you news and details of special offers.
- For statistical usage in order to facilitate improvements.
- If further processing occurs your consent will be requested.

## Who has access to some or all of the information we collect?

- Our online reservations partner, Bookassist, its branches and its subsidiary companies.
- We use third parties to aid with our marketing activities, such as our mailing list.
- Certain third parties have access to your Cookies, see our Cookie Policy for further details. Such third parties may store and process such data outside of the EU.
- Financial clearing services, including financial payment providers, possibly not sharing our Privacy Policy shall be given access from time to time to credit card information in order to facilitate the reservation process.
- Legal authorities where obligated to do so.

## Is your data secure?

• We have secure storage systems and processes in place.

## What are your rights?

- You have the right to request access to all data we hold concerning you.
- You have the right to request rectification of any data we hold concerning you.
- You have the right to request the erasure of any data concerning you; please note that the erasure of certain data may impact on the provision of our services.

- You have the right to data portability; this means that you can request for your data to be provided in a suitable format.
- Where consent is obtained in order to collect and process certain aspects of your personal data, you have the right to withdraw your consent at any time, for example, you may unsubscribe from our mailing list at any time by clicking the unsubscribe button at the bottom of the email.
- You have the right to lodge a complaint with the relevant supervisory authority.

## How long will we keep your data for?

- We keep your personal information for so long as is necessary in light of the purpose for which it was originally collected or lawfully further processed. The criteria we use to determine the period of time for which your personal information may be kept include:
  - the nature and type of personal information that you provide to us;
  - the purpose for which you provide your personal information to us; and
  - necessary business and operational requirements to continue to supply you with the services or functionality you requested.
- We may retain your information for a longer time period if we are required to do so by law.

## What can you do if you have issues or want to exercise your rights?

- You may contact our Data Protection Officer, please see our contact details above.
- In particular, if you believe that our website or systems have collected incorrect information or if you would like to dispute any information, please do not hesitate to contact us.

## Children's Privacy & Parental Consent

Please be aware that we have not designed this website for, and we do not intend for it to be used by, anyone under the age of 18 years. Accordingly, this website should not be used by anyone under the age of 18 years. Our Privacy Policy prohibits us from accepting users who are under the age of 18 years. We specifically request that persons under the age of 18 years do not use this website or submit or post information to the website. Should we inadvertently acquire personal information or other data from users under the age of 18 years, we will not knowingly provide this data to any third party for any purpose whatsoever, and any subsequent disclosure would be due to the fact that the user under age 18 years used the website and submitted personal information without solicitation by or permission from us.

## Links provided to other sites

We may provide links to a number of other web sites that we believe might offer you useful information and services. However, those sites may not follow the same Privacy Policy. Therefore, we are not responsible for the Privacy Policies or the actions of any third parties, including without limitation, any website owners whose sites may be reached through this website. We urge you to contact the relevant parties controlling these third party sites or accessing their online policies for the relevant information about their data collection practices and privacy policies before submitting any personal information or other sensitive data.

## 3. Cookies Policy

This Policy outlines how we may use Cookies on our website. To make this website work properly, we may place small data files called Cookies on your device. Cookies used by us enable us to improve our website and to deliver a more personalised service for you.

## What are Cookies?

Cookies are text files containing small amounts of information that are downloaded to your device when you visit our website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that Cookie. Cookies are useful because they allow a website to recognise a user's device. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the website or browse from one page to another. There are a number of different types of Cookies, each having a different

purpose. For example, certain Cookies are used to remember a user's action, to identify the user or for online behavioural advertising.

#### What types of Cookies may be used?

#### Strictly Necessary Cookies

Strictly Necessary Cookies are essential in order to enable you to move around the website and use its features. We use these Cookies to enable the services which you have specifically asked for.

#### Performance Cookies

Performance Cookies are Cookies which collect information on how visitors use a website, i.e. which pages visitors go to most. We use these Cookies to collect information anonymously on the pages which you have visited.

### **Functional Cookies**

Functional Cookies are Cookies which allow the website to remember choices made by the user (name, address, language). We use these Cookies to remember choices made to improve our users experience.

#### Advertising Cookies

Advertising Cookies are Cookies which are used to deliver adverts more relevant to a user's interests. They remember that a user has viewed a website before. They are often linked to the functionality of the site. We use these Cookies to collect information about your browsing habits in order to make advertising relevant to you and your interests.

#### Tailored Advertising

If you have Cookies enabled on your device, we will present you with advertisements relevant to our website. Google and third-party vendors show our advertisements across different internet sites. If you have Cookies switched on you may see advertisements for this website on other websites.

#### Third Party Cookies

We may install third party cookies on our website. Third party cookies are cookies that are set by a domain other than the website that is being visited by the user. If a user visits a website and another entity sets a cookie through that website, this would be a third-party cookie.

### What Cookies are used on the website?

The following Cookies are used on the website – in order to opt out of any of these Cookies, please see the section below entitled "How can consent be withdrawn to Cookies collection?"

## **Bookassist Cookies:**

**Bookassist session cookie** is a Strictly Necessary cookie, it's essential for the service, it maintains the user session. It's controlled by Bookassist; it expires with the session.

**Bookassist conversion tracking cookie** is a Performance cookie, it's essential for the service, it tracks conversion statistics. It's controlled by Bookassist; it expires in 1 year.

**Bookassist booking reference cookie** is a Functional cookie, it's not essential for the service, it saves user preferences. It's controlled by Bookassist; it expires in 1 year.

**Bookassist cookies policy cookie** is a Functional cookie, it's essential for the service, it's used to show cookies policy on first visit. It's controlled by Bookassist; it expires in 1 year.

**Bookassist Home Popup and Abandon Popup cookies** are Functional cookies, essential for the service, used to collect information about popups. They are controlled by Bookassist; they expire with the session.

**Bookassist newcms cookie** is a Functional cookie, it's essential for the service, it saves user preferences. It's controlled by Bookassist; it expires with the session.

**Bookassist CMS cookie** is a Functional cookie, it's essential for the service, it maintains session in hotel's website and maintains user preferences such as language. It's controlled by Bookassist; it expires in 1 year.

## **Google Cookies:**

Google Cookies are Third Party cookies controlled by Google, and can be accessed by Bookassist and the hotel. For information about Google cookies, see: https://policies.google.com/technologies/cookies

**Google Analytics** is a Third Party Performance cookie, it's essential for the service, it's used to collect information on how the website is used. See more information about Google Analytics here: <u>https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=en</u>

**Google Remarketing** is a Third Party Advertising or Tailored Advertising cookie, it's not essential for the service, it's used to deliver advertising relevant to your interests.

**Google Adwords** is a Third Party Performance cookie, it's not essential for the service, it's used to collect statistical information about use and conversion.

## **Other Third Party Cookies:**

**Facebook, Twitter and Google+** are Third Party cookies used for Social Media sharing, not essential for the service. They are controlled by those third parties.

**Vimeo and Youtube** are Third Party cookies used to provide video, not essential for the service. They are controlled by those third parties.

## Hotel to add Cookies here.

Bookassist provides a detailed list of Cookies used by Bookassist here: <a href="https://bookassist.org/cookieslist/">https://bookassist.org/cookieslist/</a>

*Will the Cookies be used for any other purposes than those stated above?* The Cookies will not be used for any purpose other than the ones stated above, notwithstanding that this Cookie Policy may change from time to time. As such it is your duty to ensure that you have read the most up to date Cookie Policy whenever you use our services or visit our website.

## How can consent be withdrawn to Cookies collection?

You can control and/or delete cookies as you wish – for details, see <u>www.aboutcookies.org</u> You can delete all Cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a website and some services and functionalities may not work.

Should you wish to opt out of Google Analytics in particular please visit the Google Analytics opt-out page <u>https://tools.google.com/dlpage/gaoptout/</u>

Should you wish to opt out of Tailored Advertising in particular please visit the Network Advertising Initiative opt-out page <a href="http://www.networkadvertising.org/choices/">http://www.networkadvertising.org/choices/</a>

Please note that by blocking Cookies, you may not be able to use the full functionality of this website, in particular the use of the booking engine to complete a reservation.

## Your right to privacy?

We respect your right to privacy. Any personal information which you provide on this website will be treated with the appropriate standards of security and confidentiality and in accordance with the General Data Protection Regulation 2016/679 and associated national legislation.

If, after supplying personal information, you require a copy of it or you wish to discuss, correct or delete it, please contact us. See our Privacy Policy above for further details.

*Policy Modifications* We reserve the right to change this Policy at any time and to publish changes without specific notification to the users of the website.