# **PRIVACY POLICY**



Last updated April 3, 2023

This privacy policy for the Tyacks Hotel (company, we, us, or our), describes how and why we might collect, store, use, share, and otherwise process your information when you use our service ('Services'), such as when you:

- Visit our website at <u>www.tyackshotel.co.uk</u>, or any website of ours that links to this privacy policy
- Engage with us in other related ways, including any sales, marketing, or events

If you have any questions or concerns regarding your data, this policy will help you understand your privacy rights and choices. If you do not agree with this policy, please do not use our Services. If you still have any questions or concerns after reading this policy, please contact us at <u>bookings@tyackshotel.co.uk</u>.

#### SUMMARY OF KEY POINTS

**What type of data about you do we collect?** We collect your name, phone number, email address, and location, but only when you consent to giving us this data.

**How do we collect your data?** We collect data about you that you voluntarily provide to us when you express an interest in obtaining information about us or our products, services, and events.

**Our purpose for processing your data?** So we can request feedback on our Services, send you marketing and promotional emails, deliver targeted advertising to you, determine the effectiveness of our promotional campaigns, and to save and protect an individual's vital interests.

**How do we keep your data secure?** We have technical and organisational security measures designed to protect the security of any data we process. However, despite our safeguards and efforts to secure information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal data.How can you exercise your rights? The easiest way to exercise your rights is by contacting us directly where we will consider and act upon any request in accordance with the applicable data protection laws. Our contact details can be found at the end of the policy.

## WHAT DATA ABOUT YOU DO WE COLLECT AND HOW DO WE COLLECT IT?

We collect data about you that you voluntarily provide to us when you express an interest in obtaining information about us or our products, services, and events. We do not collect your data without your explicit and informed consent, nor do we collect data about you from third parties.

The data about you we collect depends on the context of your interactions with us and our Services. The data we collect may include the following:

- your name
- your email address
- your phone number
- your location

Personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such information.

#### WHY DO WE PROCESS YOUR DATA?

We process your data for a variety of reasons, depending on how you interact with our Services. This may include:

- **To request feedback.** We may process your data when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications**. We may process your data for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time.
- **To deliver targeted advertising to you.** We may process your data to develop and display personalised content and advertising tailored to your interests, location, and more.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your data to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your data when necessary to save and protect an individual's vital interests, such as to prevent harm.

## WHAT LAWFUL BASIS DO WE RELY ON TO PROCESS YOUR DATA?

In accordance with the General Data Protection Regulation (GDPR) and UK GDPR, we are required to explain the valid lawful basis that we rely on in order to process your data. As such, we may rely on the following lawful basis to process your data:

- **Consent.** We may process your data if you have given us explicit permission (consent) to use your data for a specific purpose. You can withdraw your consent at any time.
- Legitimate interests. We may process your data when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. Specifically, we may process your data in order to send users information about special offers and discounts on our Services, develop and display personalised and relevant advertising, support our marketing activities, and understand how users use our Services so we can improve user experience.
- Legal obligations. We may process your data where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital interests.** We may process your data where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

#### WHEN AND WITH WHOM DO WE SHARE YOUR DATA?

In certain instances, we may need to share your data with third parties. Examples of when we may share your data with third parties include the following:

- **Email Marketing Software.** We may share or transfer your data with software that supports our marketing activities.
- **Business Transfers.** We may share or transfer your data in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set in our Cookie Policy.

We at the Tyacks Hotel and our website <u>www.tyackshotel.co.uk</u> use Google Analytics to collect data. We need this data to understand how you use our website so we can improve its design and functionality. We also need the data to get the most out of our marketing campaigns.

#### HOW LONG DO WE KEEP YOUR DATA?

We will only keep your data for as long as necessary for the purposes set out in this privacy policy, unless a longer retention period is required by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your data, we will either delete or anonymise such information, or, if this is not possible, then we will securely store your data and isolate it until deletion is possible.

#### HOW DO WE KEEP YOUR DATA SAFE?

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any data we process. However, despite our safeguards and efforts to secure information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your data. Although we will do our best to protect your personal data, transmission of your data to and from our Services is at your own risk. You should only access the Services within a secure environment.

#### WHAT ARE YOUR DATA PRIVACY RIGHTS?

In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal data. You may review, change, or terminate the data about you we have at any time. You can make such a request by contacting us by using our contact details provided in the section 'OUR CONTACT DETAILS' below.

If you are located in the EEA or UK and you believe we are unlawfully processing your data, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO

at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

- Withdrawing your consent. If we are relying on your consent to process your data, which may be expressed and/or implied consent. You can withdraw your consent at any time by contacting us directly. Please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- **Opting out of communications.** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us directly. You will then be removed from the marketing lists. However, we still may communicate with you, for example, to send you service-related messages that are necessary for the administration and use of your data, to respond to service requests, or for other non-marketing purposes.
- **Cookies and similar technologies.** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services. You may also opt out of interest-based advertising by advertisers on our Services.

If you have any questions or comments about your privacy rights, you may email us at any time at bookings@tyackshotel.co.uk.

## **CONTROLS FOR DO-NOT-TRACK FEATURES**

Most Web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

## DO WE MAKE UPDATES TO THIS NOTICE?

We may update this privacy policy from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this policy frequently to be informed of how we are protecting your data.

## **OUR CONTACT DETAILS**

If you have any questions or comments about this policy, you may contact our Data Protection Officer (DPO), Sam Bowen, by emailing, phoning, or posting to the following:

Sam Bowen Tyacks Hotel 27 Commercial Street Camborne, Cornwall TR14 8LD bookings@tyackshotel.co.uk 01209 612424

## HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal data we collect from you, change that information, or delete it. To request to review, update, or delete your personal data, please contact us directly.