

## PRIVACY NOTICE

### Introduction

Dakota Hotels are operated by Dakota Hospitality Limited (“DHL” and “Company”). DHL respects your personal information and undertakes to comply with all applicable data protection legislation currently in force. Data Protection law changed on 25 May 2018. This notice sets out most of your rights under the new laws.

Your privacy is protected by the law and is fully detailed in the EU General Data Protection Regulation 2016 (“GDPR”) which can be accessed at <https://ico.org.uk>. Legislation however, can be very complicated so we have our own more transparent promise to you. We promise:

- Never to sell your data.
- Never to pass your data to third parties other than those listed below that we use to legitimately process your information on our behalf.
- To keep your data safe and private.
- To give you reasonable access to the data we hold on you and the right to correct it, restrict its use or delete it where it is not otherwise required to be kept by law.
- To allow you to stop being marketed to at any time.

### How we use your personal information

This privacy notice is to let you know how DHL uses and promises to look after your personal information. DHL may use personal information provided by you or a third party either with your consent or on the basis of the following:

1. **Contract:** the processing is necessary for a contract we have with you.
2. **Legal obligation:** the processing is necessary for us to comply with the law.
3. **Vital interests:** the processing is necessary to protect someone’s life.
4. **Public task:** the processing is necessary for us to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.
5. **Legitimate interests:** the processing is necessary for our or your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

Except as provided under these terms, the company will not disclose your personal information without your permission unless such disclosure is required by law or other court order.

In accordance with the GDPR, you are entitled to request a copy of the information which the company holds about you. If you become aware that the personal information the company holds about you is inaccurate, you may request that it is amended. Any requests in this respect or any other correspondence relating to this notice should be made in writing.

Where processing is based upon consent, you have the right to withdraw consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

The company’s data protection officer is Jordan Bond, who can provide you with more information on the company’s processing of your data. Email [gdpr@dakotahotels.co.uk](mailto:gdpr@dakotahotels.co.uk) for any such enquiries.

## How information about you will be used

DHL collects information about you. This is to:

1. Ensure that we can verify your identity.
2. Enhance your experience with us.
3. Provide you with relevant information.
4. Reserve, secure and guarantee services.
5. Take payment for goods and services received.

The Supervisory authority in the UK & NI is the Information Commissioner's Office ("ICO"). Where you have a complaint regarding the handling of your data which you do not think can be handled internally, then you have the right to make a complaint to the ICO.

## Sharing information

The below table provides information as to what information we hold on you and who we may share it with for processing purposes:

Business function	Purpose of processing	Categories of individuals	Categories of personal data	Categories of third party recipients
Marketing	Direct marketing	Website Subscribers	Email address	Processor - marketing website; Mailchimp, Spin Dogs
Marketing	Loyalty members direct marketing	Loyalty app members, Prospective members, Loyalty database subscribers	Email address	Processor - marketing website; Send Grid
Marketing	Loyalty program administration	Loyalty app members, Future, Present and Past Guests	Contact details, DOB, History & Preferences	Processor - Begin
COVID19 track and trace / test and protect	Government compliance stored for a minimum of 21 days. Individual may request the deletion of their data after 21 days.	Future, Present and Past Guests	Contact details – Name, email address and telephone number.	Processor – Restaurant Diary (bar and restaurant tables), Guestline / ResLynx (bedroom guests), Mailchimp (bar, restaurant, bedroom).
Guestline - Rezlynx	All Bedroom Bookings	Future, Present and Past Guests	Contact details - Name, email address and telephone number.	Processor – Guestline / ResLynx. Integrated Decisions and Systems, Inc ("IDeaS").
Guestline - Rezlynx	All Bedroom Bookings	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Secure Trading

Guestline - Rezlynx	All Bedroom Bookings	Future, Present and Past Guests	History & Preferences	Processor - Guestline
Website Bookings	Online Bedroom Booking	Future Guests	Contact Details	Processor - Guestline / ResLynx
Website Bookings	Online Bedroom Booking	Future Guests	Credit / Debit Card Details	Processor - Guestline / ResLynx
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Credit / Debit Card Details	Processor – Navarino and third party website the guest booked through themselves including but not limited to Booking.com, Ogado, Trip Advisor, LastMinute.com and Expedia.
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Contact Details	Processor – third party website the guest booked through themselves including but not limited to Booking.com, Ogado, Trip Advisor, LastMinute.com and Expedia.
Website Bookings	Online Bedroom Booking	Future, Present and Past Guests	Contact Details, History & Preferences, COVID-19 related health Q&A	Processor - UpsellGuru
Credit Card Terminal	Credit / Debit Card Payments	All paying customers	Credit / Debit Card Details	Processor - Elavon, Barclaycard
Restaurant Diary	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, requests and dietary notes	Processor - Restaurant Diary
Restaurant Diary	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, Credit / Debit Card Details	Processor – Stripe
Restaurant Diary	Restaurant Booking	Future, Present and Past Guests	History & Preferences	Processor - Restaurant Diary

Shuttle Diary	Shuttle Booking	Future, Present and Past Guests	Contact details	Processor – Cloudsoft / Amazon Web Services
CCTV	Safety and Security	All persons on hotel property	Photographic Image	Police; HMRC; Hands Partnership (H&S Consultants); Xact Group Ltd (HR Consultants)
Health and Safety	External advice, Legal Obligation	Future, Present and Past Guests	Contact Details, descriptions of Health & Safety incident including accident or alleged food poisoning.	Health and Safety Executive, Hands Partnership (H&S Consultants); Hendersons Insurance Brokers and related insurance companies
Gift Vouchers	Voucher Sales and Delivery	Gift Voucher Customers and Recipients	Contact details (Purchaser)	Processor - SK Chase
Gift Vouchers	Voucher Sales and Delivery	Gift Voucher Customers and Recipients	Contact Details (Recipient)	Processor - SK Chase