

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Britannia Hotels Group collecting/processing their personal data.
- 2.2 All Employees/Staff of Britannia Hotels Group who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

Britannia Hotels is a United Kingdom hotel group with 60 hotels across the country. It includes the Pontins 6 Holiday Parks portfolio. We provide value for money hotel rooms along with self catering apartments in our Holiday Parks.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- [dpo@britanniahotels.com](mailto:dpo@britanniahotels.com)

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b> (where Britannia Hotels Group obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name, Address, Email Address, Telephone number	Direct or via 3 <sup>rd</sup> party websites such as Booking.com
Age	Direct or via 3 <sup>rd</sup> party websites such as Booking.com
Biometric Prints/Images	Direct from Staff Member
Child Name & Age	Direct or via 3 <sup>rd</sup> party websites such as Booking.com

The personal data we collect will be used for the following purposes:

- To process and confirm your hotel or holiday park reservations
- To manage time and attendance for staff payroll purposes

Our legal basis for processing for the personal data:

- Contractual Obligations

Britannia Hotels Group



Any legitimate interests pursued by us, or third parties we use, are as follows:

- Commercial interest

The special categories of personal data concerned are:

- Biometric Data

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Britannia Hotels Group to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting [dpo@britanniahotels.com](mailto:dpo@britanniahotels.com) and stating you wish to withdraw your consent for full or partial processing. You may also update your preferences on any email communications you may receive from us.

### 3.3 Disclosure

Britannia Hotels Group will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
Emarsys Marketing	Encrypted Transfer	Y
Oracle CRM	Encrypted Transfer	Y
Eclipse Colour	Encrypted Transfer	Y

### 3.4 Retention period

Britannia Hotels Group will process personal data for the duration of your booking process and stay and/or employment and will store the personal data for up to 7 years dependent on financial transactions, in line with our company Retention Policy.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

Britannia Hotels Group



# PRIVACY NOTICE

## Document Control

Reference: GDPR REC 4.1

Issue No: 5

Issue Date: 19/04/19

Page: 3 of 12

- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Britannia Hotels Group refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Britannia Hotels Group (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Britannia Hotels Group's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
Contact Name:	Information Commissioners Office	Britannia Hotels Group
Address line 1:	Wycliffe House	Halecroft
Address line 2:	Water Lane	253 Hale Road
Address line 3:	Wilmslow	Cheshire
Address line 4:	Cheshire	WA15 8RE
Address line 5:	SK9 5AF	
Email:	casework@ico.org.uk	<a href="mailto:dpo@britanniahotels.com">dpo@britanniahotels.com</a>
Telephone:	0303 123 1113	0161 904 8686

## 4. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

Britannia Hotels Group



“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

## How we use your information

This privacy notice tells you how we, Britannia Hotels Group, will collect and use your personal data.

When you visit our website we may place cookies on your browser. We use cookies to be able to provide a better website, service and statistics. Cookies are small pieces of text sent by your web browser by almost every website you visit. A cookie text file is stored in your web browser and allows us or a third-party to recognise you and make your next visit easier. They help us monitor our visitor's behaviour. Cookies don't give us access to your device or any personal information, other than the data you choose to share with us.

Cookies can be "persistent" or "session" cookies. "Session" cookies are stored on memory and never written to disk. When the browser is closed the cookie is permanently deleted. If the cookies contain an expiry date, it is considered a "persistent" cookie, which will be removed on the specified date. They can also be deleted manually. You can accept or decline cookies. Cookies are accepted by default by most browsers, if you would like to disable them please refer to your browser's help section.

We use 'first party' and 'third party cookies' on our website.

'First party' cookies are set by us. These cookies ensure that your booking process is remembered between pages, so that we are able to process your booking and payment properly. We also use cookies to be able to monitor our website performance.

'Third party' cookies are set by our trusted partners.

## **Please see Addendum 1 for a list of cookies used.**

- We use Google Analytics cookies to be able to measure and track the usage of our website. This helps us to identify areas for improvement. We also want to track how many of our visitors make bookings, which helps us to make business forecasts and decisions.

- We use Google AdWords – Google's main advertising product. AdWords offer pay-per-click (PPC) advertising displayed next to search results to boost website traffic and sales.

Britannia Hotels Group



- We use Google Display Network to retarget our customers. You may see our adverts on other websites, after you've visited ours.

- We use Yahoo Gemini Network to be able to target and retarget our customers with display adverts.

- We work with several affiliate partners who advertise on our behalf, their cookies help us to see if our customers came to our website through one of the affiliate advertisers, so we can credit them correctly.

- We also use social media buttons e.g. Facebook and Twitter, to allow you to connect to your social networks and share content.

- We use Hotjar cookies to record and monitor user's behaviour on our website, this helps us to improve the website content and functionality as well as understand how our customers use our website, which allows us to make improvement decisions. Hotjar records visits to our website in a video format. It also produces heatmaps to help us identify the most visited areas of our website. It is also used by us to gather feedback from our visitors.

- We use Emarsys cookies to monitor performance of our email newsletters and to be able to track and target our subscribers.

- We use dotdigital cookies to monitor performance of our email newsletters and to be able to track and target our subscribers.

- We use Sub2 Technologies cookies to monitor performance of our email newsletters and to be able to track and target our subscribers.

By continuing to use our site and by using the social media functionality, you consent to the relevant cookies being set on your device. For more information about cookies and how to disable them please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Why does Britannia Hotels Group need to collect and store personal data?

In order for us to provide you with the service/accommodation you have booked we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Britannia Hotels Group would contact you for additional consent.

Britannia Hotels Group



## Will Britannia Hotels Group share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Britannia Hotels Group in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Britannia Hotels Group's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## How will Britannia Hotels Group use the personal data it collects about me?

Britannia Hotels Group will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Britannia Hotels Group is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Under what circumstances will Britannia Hotels Group contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Can I find out the personal data that the organisation holds about me?

Britannia Hotels Group at your request, can confirm what information we hold about you and how it is processed. If Britannia Hotels Group does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Britannia Hotels Group or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.

Britannia Hotels Group



# PRIVACY NOTICE

## Document Control

Reference: GDPR REC 4.1

Issue No: 5

Issue Date: 19/04/19

Page: 7 of 12

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

Britannia Hotels Group accepts the following forms of ID when information on your personal data is requested:

Passport or driving licence or birth certificate.

### Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Abigail Staley
Address line 1:	Halecroft
Address line 2:	253 Hale Road
Address line 3:	Cheshire
Address line 4:	WA15 8RE
Email:	dpo@britanniahotels.com
Telephone:	0161 904 8686

### ***Document Owner and Approval***

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all staff and customers. Previous versions are available upon request to the DPO ([dpo@britanniahotels.com](mailto:dpo@britanniahotels.com)).

Britannia Hotels Group



# PRIVACY NOTICE

## Document Control

Reference: GDPR REC 4.1  
Issue No: 5  
Issue Date: 19/04/19  
Page: 8 of 12

Signature: *Abigail Staley*

Date: 19/04/19

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	RCF	22/3/18
2.	Updated Draft 2	RCF	24/4/18
3.	Updated	RCF	12/7/18
4.	Updated	RCF	27/02/19
5.	Updated	RCF	09/04/19

## Addendum 1 Pontins Cookies

**adnxs.com**

Registers a unique ID that identifies a returning user's device.  
The ID is used for targeted ads.

**advertising.com**

This domain is owned by Advertising.com (AOL). The main business activity is: Advertising.

**bidswitch.net**

This domain is owned by IPONWEB and is used to provide a real time bidding platform for online advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**bing.com**

This domain is owned by Microsoft - it is the site for the search engine Bing. The main purpose of cookies set by this host is: Targeting/Advertising

**bat.bing.com**

This domain is owned by Microsoft - it is the site for the search engine Bing. The main purpose of cookies set by this host is: Targeting/Advertising

**doubleclick.net**

This domain is owned by Doubleclick (Google). The main business activity is: Doubleclick is Google's real time bidding advertising exchange. The main purpose of cookies set by this host is: Targeting/Advertising

**google.co.uk**

This domain is owned by Google Inc and is the company's UK oriented search site. Although Google is primarily known as a search engine, the company provides a diverse range of

Britannia Hotels Group





products and services. Its main source of revenue however is advertising. Google tracks users extensively both through its own products and sites, and the numerous technologies embedded into many millions of websites around the world. It uses the data gathered from most of these services to profile the interests of web users and sell advertising space to organisations based on such interest profiles as well as aligning adverts to the content on the pages where its customer's adverts appear. The main purpose of cookies set by this host is:

Targeting/Advertising

[www.google.co.uk](http://www.google.co.uk)

This domain is owned by Google Inc and is the company's UK oriented search site. Although Google is primarily known as a search engine, the company provides a diverse range of products and services. Its main source of revenue however is advertising. Google tracks users extensively both through its own products and sites, and the numerous technologies embedded into many millions of websites around the world. It uses the data gathered from most of these services to profile the interests of web users and sell advertising space to organisations based on such interest profiles as well as aligning adverts to the content on the pages where its customer's adverts appear. The main purpose of cookies set by this host is:

Targeting/Advertising

**republer.com**

This domain is owned by REPUBLER and is used to provide a real time bidding platform for online advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**rubiconproject.com**

This domain is owned by Rubicon Project. The main business activity is: Advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**pixel.rubiconproject.com**

This domain is owned by Rubicon Project. The company runs a technology platform for automated real time bidding for online behavioural advertising. Their cookies build user profiles for the purposes of placing individuals into segmented categories, so that they can be shown advertising believed to be relevant to interests based on past browsing patterns. The main purpose of cookies set by this host is: Targeting/Advertising.

Britannia Hotels Group



# PRIVACY NOTICE

## Document Control

Reference: GDPR REC 4.1

Issue No: 5

Issue Date: 19/04/19

Page: 10 of 12

**recommender.scarabresearch.com**

This domain is owned by Emarsys. The main business activity is: Advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**smartadserver.com**

This domain is owned by Smart Ad Server. The main business activity is: Advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**spotxchange.com**

This domain is owned by spotxchange. The main business activity is: Video Advertising. The main purpose of cookies set by this host is: Targeting/Advertising

**vdopia.com**

This domain is owned by Chocolate, a re-targeting platform for online marketing. The main purpose of cookies set by this host is: Targeting/Advertising

**veinteractive.com**

This domain is owned by VE Interactive, a re-targeting platform for online marketing. The main purpose of cookies set by this host is: Targeting/Advertising

**config1.veinteractive.com**

This domain is owned by VE Interactive, a re-targeting platform for online marketing. The main purpose of cookies set by this host is: Targeting/Advertising

**volvelle.tech**

This domain is owned by VE Interactive, a re-targeting platform for online marketing. The main purpose of cookies set by this host is: Targeting/Advertising

**yahoo.com**

This domain is owned by Yahoo. The main business activity is: Search / Advertising. The main purpose of cookies set by this host is: Targeting/Advertising.

## Britannia Cookies

**bat.bing.com**

This domain is owned by Microsoft - it is the site for the search engine Bing. The main purpose of cookies set by this host is targeting/advertising

**bing.com**

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Britannia Hotels Group



**crwdcntrl.net**

This domain is owned by Lotame. The main business activity is: Data Management Platform - Targeting /Advertising. The main purpose of cookies set by this host is targeting/advertising.

**facebook.com**

This domain is owned by Facebook, which is the world's largest social networking service. As a third-party host provider, it mostly collects data on the interests of users via widgets such as the 'Like' button found on many websites. This is used to serve targeted advertising to its users when logged into its services. In 2014 it also started serving up behaviourally targeted advertising on other websites, similar to most dedicated online marketing companies.

**google.co.uk**

This domain is owned by Google Inc and is the company's UK oriented search site. Although Google is primarily known as a search engine, the company provides a diverse range of products and services. Its main source of revenue however is advertising. Google tracks users extensively both through its own products and sites, and the numerous technologies embedded into many millions of websites around the world. It uses the data gathered from most of these services to profile the interests of web users and sell advertising space to organisations based on such interest profiles as well as aligning adverts to the content on the pages where its customer's adverts appear. The main purpose of cookies set by this host is targeting/advertising

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# PRIVACY NOTICE

## Document Control

Reference: GDPR REC 4.1

Issue No: 5

Issue Date: 19/04/19

Page: 12 of 12

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**yahoo.com** This domain is owned by Yahoo. The main business activity is: Search / Advertising. The main purpose of cookies set by this host is targeting/advertising.

**awin1.com** These cookies let us track we track any money as a commission to an affiliate site which has referred your business to us.

**zenaps.com**

**cloudflare.com** The \_\_cfduid cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.

**dc-storm.com** This cookie collects data related to user's visit to the website such as number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying ads.

**doubleclick.net** This domain is owned by Doubleclick (Google). The main business activity is: Doubleclick is Google's real time bidding advertising exchange. The main purpose of cookies set by this host is targeting/advertising.

**hotjar.com** Hotjar cookies help us to understand how our visitors are using our website

**r1-t.trackedlink.net** Tracks and identifies a visitor whilst they browse a site's pages and make purchases. Identifies the contact to enable personalisation when they visit any landing page

**Sub2tech.com** Tracks and identifies a visitor whilst they make a purchase on our website

Britannia Hotels Group

