

## 1. Scope

- 1.1 Britannia Hotels Ltd is committed to protecting and respecting privacy. This notice is designed to provide you with information about our practices concerning the collection, use and disclosure of your personal information in accordance with the General Data Protection Regulation ("GDPR").
- 1.2 This document also sets out our Cookie Notice regarding the information we collect automatically from your use of our website.

## 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. General Data protection principles

In collecting and processing your personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

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## 4. Privacy notice

### 4.1 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)

### 4.2 How do we collect your personal information?

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

Personal data type:	Source:
Name, Address, Email Address, Telephone number	Direct, from an employee or via 3 <sup>rd</sup> party websites such as Booking.com
Age/Date of Birth	Direct or via 3 <sup>rd</sup> party websites such as Booking.com
Identification: Driving License Number, Passport Number	Direct or via 3 <sup>rd</sup> Parties e.g. Tour Operators
Child Name & Age	Direct or via 3 <sup>rd</sup> party websites such as Booking.com
Images of customers and third parties	CCTV footage
Credit card/payment details	Direct or via 3 <sup>rd</sup> party websites such as Booking.com
Health/Disability Data	Direct or via 3 <sup>rd</sup> Parties e.g. Tour Operators
IP Address	Direct

Britannia Hotels Group accepts the following forms of ID when information on your personal data is requested: Passport or driving licence or birth certificate.

### 4.3 Why does Britannia Hotels Group need to collect, use 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. This includes for the purposes of:

- processing, confirming, providing and charging for accommodation and restaurant reservations and our goods and services;

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- fulfilling contractual obligations to you and anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) and vendors (e.g. credit card companies, airline operators and other loyalty programmes);
- employees may have provided your details as an emergency contact as part of their employment contract (name, telephone number, address and relationship to the employee), they will be stored for the duration of their employment and only processed in emergency circumstances;
- providing you with access to the content on our website, and responding to your enquiries and requests for information and services;
- Britannia Hotels collects CCTV footage for the prevention and detection of crime, it is in our legitimate interest to do this to ensure appropriate security for our premises; and
- for marketing purposes.

#### 4.4 Legal grounds on which we will process your personal data

We will only use your personal information when the law allows us to do so, i.e. where we have a lawful basis for processing. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the **contract** we are about to enter into or have entered into with you, or take any steps you ask us to before entering into a contract with you.
- Where it is necessary to do so in order to comply with any **legal obligations** we have.
- On the basis of **consent**:
  - Where we rely on your consent for processing this will be brought to your attention when the information is collected from you. An example of this is when you sign up to receiving marketing through our website. Every marketing email we send gives you the opportunity to withdraw consent by unsubscribing.
  - 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.

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- Where the processing is necessary for our **legitimate interests** in providing or promoting our services and managing our workforce.

We may process special category personal data<sup>1</sup> with your explicit consent or where permitted by data protection law, such as where it is necessary to protect your vital interests (for example in the event of an emergency), where it is in the substantial public interest or where the data has been manifestly made public by you.

#### **4.5 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.

We process personal information in connection with marketing or communications purposes, including so that we can share with you news and offers about our products and services. We strive to provide you with choices around what marketing communications you receive from us. To ensure that we continue to provide you with the most relevant information, you can review and update your marketing preferences at any time by clicking 'update your preferences' in any of our emails. You can also unsubscribe from marketing communications by clicking on the 'Unsubscribe' link found in any of our emails received.

#### **4.6 Who might we share your information with?**

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 special category data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We may also share your information with law enforcement bodies if necessary for the prevention or detection of crime.

#### **4.7 Transferring personal information outside the EEA**

We may transfer personal data outside the European Economic Area ("EEA") where adequate protection measures are in place in compliance with data protection laws. The following third-party processors will receive your personal data by way of encrypted transfer: Emarsys Marketing; Oracle CRM; and, Eclipse Colour.

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<sup>1</sup> For example, information about an individual's race, ethnic origin, Politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health; sex life, or sexual orientation.  
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## 4.8 Retention period

Britannia Hotels Group will process personal data for the duration of your booking process and stay and will store certain personal data relating to financial transactions for up to 7 years.

## 4.9 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 to be informed – you have the right to be informed about the collection and the use of their personal data
- 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.
- 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.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.6 above) in the processing of your personal data.

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### 4.10 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 3.6 above) you have the right to lodge a complaint directly with Britannia Hotels Group's Data Protection Officer / GDPR Owner. If you remain dissatisfied, you can complain to the Information Commissioner. The details for each of these contacts are as follows:

	<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:	<a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>	<a href="mailto:dpo@britanniahotels.com">dpo@britanniahotels.com</a>
Telephone:	0303 123 1113	0161 904 8686

### 4. Cookie policy

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.

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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.

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.

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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).

## 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 customers. Previous versions are available upon request to the DPO ([dpo@britanniahotels.com](mailto:dpo@britanniahotels.com)).

Signature: *Abigail Staley*

Date: 12/07/19

## 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
6.	Updated	RCF	18/06/19
7.	Updated(emergency contact)	RCF	12/07/19

## 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.

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### 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.com

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.

### 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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<b>republer.com</b>	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.
<b>rubiconproject.com</b>	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.
<b>pixel.rubiconproject.com</b>	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.
<b>recommender.scarabresearch.com</b>	This domain is owned by Emarsys. The main business activity is: Advertising. The main purpose of cookies set by this host is: Targeting/Advertising.
<b>smartadserver.com</b>	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.
<b>spotxchange.com</b>	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.
<b>vdopia.com</b>	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.
<b>veinteractive.com</b>	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.
<b>config1.veinteractive.com</b>	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.

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**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**

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.

**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

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adverts appear. The main purpose of cookies set by this host is targeting/advertising.

### google.com

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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/zenaps.com

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

### 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.

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**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.

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