

## **PRIVACY POLICY FOR THE DRAKE HOTEL**

This is the Privacy Policy of Drake Hotel. Drake Hotel has prepared this privacy statement to inform you with respect to how we collect, use, disclose and safeguard your personal data.

This privacy Policy describes the privacy practices of Drake Hotel for the data we collect through various channels, such as:

When you use and interact with websites operated by us (the "Websites").  
When you visit or stay as a guest at one of our properties, or through other offline interactions.  
When we e-mail you HTML formatted communications.  
Collectively, we refer to the Websites and offline channels as "Services."

By using the Services, you agree to terms and conditions of this Privacy Policy.

This Privacy Policy may change from time to time. Your continued use of our Services is deemed acceptance of such changes, so you should check this page periodically for updates.

### **TYPES OF PERSONAL INFORMATION WE COLLECT**

"Personal Information" is any information that can either directly or indirectly identify you as an individual. As we strive to provide you with the optimal guest service experience, we may collect Personal Information in accordance with the law, such as:

- Your name, gender, home and work contact details, business title, date, interests and place of birth.
- Guest stay information, including the hotels at which you stayed, date of arrival and departure, goods and services purchased, special requests made, service preferences, telephone numbers dialled, and faxes and telephone messages received.
- Your payment card details, online user account details, profile and password details, and any frequent flyer or travel partner program affiliation.
- Any information necessary to fulfill special requests.
- Information you provide regarding your marketing preferences, or in the course of participating in surveys, contests or promotional offers.
- Details of transactions you carry out through our website. You may be required, for example, to provide financial information before making a reservation through our website.
- Images, video and audio recorded by security cameras located in public areas.
- If you submit any Personal Information to us or our Service providers about another individual (e.g., making a reservation on their behalf), you represent that you are authorized to do so and permit us to use the information in accordance with this Privacy Policy.

## HOW WE COLLECT YOUR INFORMATION

We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information through:

Direct interactions – You may give us your information by filling in forms via our Website or by corresponding with us in person, by post, phone, email or otherwise. This includes personal data you provide when you:

- Make an inquiry.
- Make a reservation.
- Book an event.
- Subscribe to our marketing list.
- Enter a competition, promotion or survey.
- Automated technologies or interactions – As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Typically, the data we collect automatically does not reveal your specific identity or directly relate to an individual; however, to the extent that it does reveal your specific identity or relate to an individual, we will protect the information in accordance with this Privacy Policy.

### We collect data through these automated technologies and interactions from:

- Your browser or device – We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and internet browser type and version.
- Cookies – Cookies are small pieces of information that are stored in a browser-related file on your computer's hard drive when you visit our site. We use cookies to collect and maintain aggregated data (such as the number of visitors) to help us see which areas are most popular with our users and improve and update the content on our website. Cookies also allow you to login without typing the registered e-mail address or registration number and password. We also use them to deliver information and fresh content specific to your interests. Cookies are widely used on most major sites. We may use third party advertising companies to serve ads on our behalf. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. If you do not want data collected with cookies, you can learn more about controlling cookies at: <https://www.allaboutcookies.org/manage-cookies/index.html>. You can choose whether to accept cookies by changing the settings on your browser or, if you are an EU resident, by managing your settings using our preferences tool. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests and needs. At this time, we do not respond to browser "Do-Not-Track" signals.
- Pixel Tags and other similar technologies – We collect data from pixel tags (also known as web beacons and clear GIFs), which are used to, among other things, track the actions of users of the Website or email recipients of HTML email communications (did you open the e-mail), measure the success of our marketing campaigns and compile statistics about usage of the Website.
- Analytics – Google Analytics is a web analysis service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Websites. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- Your IP Address – We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Websites. We also may derive your approximate location from your IP address (Geolocation).
- Aggregated Data. We may aggregate data that we collected, and this aggregated data will not personally identify you or any other user.

## WHY WE USE PERSONAL INFORMATION

We use your Personal Information to provide you with our Services, to develop new offerings and to protect Drake Hotel and our guests. Certain Services we provide will require you to provide select Personal Information to us. If you do not provide the necessary Personal Information, we may not be able to provide the requested Services to you. Subject to applicable laws, we may collect, use and disclose relevant portions of your personal information to perform the following activities.

### **Purpose/Activity Lawful Basis for Processing**

Process information received from our Website regarding inquiries or submitting registration forms.

#### **Process hotel bookings:**

- Manage payments, fees and charges
- Collect and recover money owed to us
- Process bookings
- Ensure your room is available
- Performance of a contract with you
- Necessary for our legitimate interests (to recover debts due to us)

#### **Manage our relationship with you:**

- Notifying about changes to our terms.
- Asking you to leave a review or take a survey.
- Send confirmations and pre-arrival messages.
- Send electronic copies
- Provide customer service (e.g., place dining or lounge reservations, provide additional pillows, etc.).
- For internal administrative purposes.
- Performance of a contract with you
- Necessary to comply with a legal obligation.
- Necessary for our legitimate interests (to keep our records updated, manage our operations, ensure we keep you informed and are responsive to your questions and needs, and assess customer feedback so we can continue to improve our services to you)

#### **Personalize our services to your personal preferences:**

- Customize your experience according to your personal preferences directly told to us by you or that we learn through our interactions with you.
- Present offers that we believe will enhance your confirmed stay and experience with us.
- Necessary for our legitimate interests to ensure your stay is as enjoyable as possible, and to enhance our relationship with you.
- Send you marketing communications and promotional offers Consent
- To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
- Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud)
- Necessary to comply with a legal obligation
- To deliver relevant Website content and advertisements to you, and measure or understand the effectiveness of the advertising we serve to you. Necessary for our legitimate interests (to study how customers use Our products/services, to develop them, to grow Our business and to inform Our marketing strategy)
- To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences Necessary for our legitimate interests (to define types of customers for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)

- Monitoring and preventing unlawful acts (including with the use of closed circuit television, card keys, and other security systems)
- Necessary for the purposes of the prevention or detection of an unlawful act
- Must be carried out without the consent of the data subject so as not to prejudice those purposes, and is necessary for reasons of substantial public interest.

## **SHARING OF PERSONAL INFORMATION**

We reveal personal information about you to unaffiliated third parties if:

- You request or authorize it.
- The information is provided to help complete a transaction for you.
- The information is provided to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety – or the rights, property or safety of our users or others (e.g., to a consumer reporting agency for fraud protection).
- The disclosure is done as part of a purchase, transfer or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets).
- The information is provided to our agents, outside vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, bankers, auditors, etc.)
- To others as described in this Privacy Policy.

## **THIRD-PARTY ADVERTISERS**

We may also share website usage information about visitors to our website with third parties, such as advertisers on our website, for the purpose of managing and targeting advertisements and for market research analysis on our website and other sites. For these purposes, we and our third-party advertising companies may place pixel tags (also called clear gifs) on some of the pages you visit on our website. We will then use the non-personally identifiable information that is collected using these pixel tags to serve you relevant advertisements when you are visiting other sites on the internet. These advertisements may be targeted to specific searches you conducted on our website during earlier browsing sessions.

Third party Internet sites available through advertising and other links on our site have separate privacy and data collection practices. If you click on a link found on our website or any other website, you should always look at the location bar within your browser to determine whether you have been linked to a different website.

This Policy, and our responsibility, is limited to our own information collection practices. We are not responsible for, and cannot always ensure, the information collection practices or privacy policies of other websites maintained by third parties or our service providers, where you submit your personal information directly to such websites. Please read the privacy and security policies of any external sites before providing any personal information while accessing those sites.

## **TRANSFER OF DATA**

Your information, including Personal Data, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. As such, we have put in place procedures to deal with any suspected personal data breach, and we will notify you and any applicable regulator of a breach where we are legally required to do so.

## **RETENTION OF DATA**

We will retain your Personal Information only for as long as necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Website usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Website, or we are legally obligated to retain this data for longer time periods.

## **CHILDREN'S PRIVACY AND PARENTAL CONSENT**

Our website does not sell products or services for purchase by children. This website should not be used by anyone under age 18 without the involvement of a parent or guardian.

## **YOUR CONSENT TO THIS PRIVACY PLAN**

Use of our website signifies your consent, as well as the consent of the company for whom you use our website, and whose information you submit (if any) to this online Privacy Policy, including the collection and use of information by our website, as described in this Privacy Policy, and also signifies agreement to the Terms of Use for the website. Do not continue to access and use the website if you do not accept the terms of this Privacy Policy.

## **YOUR DATA PROTECTION RIGHTS**

Drake Hotel aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Information we hold about you, object to our processing, and/or if you want it to be removed from our systems, please contact us at [info@drakehotelplymouth.com](mailto:info@drakehotelplymouth.com).

If you no longer want to receive marketing related e-mails, you may opt out anytime contacting us directly at [info@drakehotelplymouth.com](mailto:info@drakehotelplymouth.com) or by clicking the unsubscribe button located at the bottom of every marketing e-mail.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights afforded to you by the Global Data Protection Regulation ("GDPR").

## **POLICY MODIFICATIONS AND CONTACTING US**

We reserve the right to change this Privacy Policy at any time. Notice of changes will be published on this page. Changes will always be prospective, not retroactive. If you have questions about our policies, please contact: [info@drakehotelplymouth.com](mailto:info@drakehotelplymouth.com).