

# MERIDIAN LEISURE HOTELS GUEST PRIVACY POLICY

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## OUR COMMITMENTOUR COMMITMENT

As our valued guest ("You"), we value your commitment to Meridian Leisure Hotels. Our first priority is to offer You exceptional stays at our hotels, and we recognise that your privacy forms part of our commitment to our guests. Our Guest Privacy Policy is outlined below which describes how hotels operated by MERIDIAN LEISURE HOTELS use your personal information in accordance with the Data Protection Act (1998) and the General Data Protection Regulation.

## CONSENT TO THIS HOTEL GUEST PRIVACY POLICY

Please read our Guest Privacy Policy carefully before providing us with any of your Personal Information ("PI"), i.e., any information collected and recorded in any format that identifies You personally, whether directly (e.g. name) or indirectly (e.g. phone number). This Guest Privacy Policy is part of MERIDIAN LEISURE HOTELS terms and conditions governing our hotel services. By accepting said terms and conditions, you expressly consent to this Guest Privacy Policy.

## WHO COLLECTS MY DATA?

Data pertaining to your experience in a hotel managed by MERIDIAN LEISURE HOTELS is gathered by MERIDIAN LEISURE HOTELS, a hotel group, based at Wharfedale Road, Winnersh Wokingham RG41 5TS United Kingdom . Where your stay is within a hotel operated under a franchise agreement with a hotel brand, your data will also be collected by the hotel brand e.g. InterContinental Hotels Group.Data is collected during the booking process either via a brand booking engine or independent third party booking engine provider (Sabre Hospitality Solutions and others).

## WHEN IS MY PERSONAL INFORMATION COLLECTED?

PI may be collected in certain circumstances as follows:

- Booking of a hotel room – through on and offline channels including brand and independent (Sabre Hospitality Solutions etc) booking engines
- Enquiries made at a hotel for provision of services (meeting rooms, wedding venue, spa and banqueting enquiries)
- Check in and check out
- Consumption during a stay in a hotel as tracked through room charges
- Claims, requests and/or disputes
- Participation in marketing programs, with your explicit consent
- Registering with loyalty programs
- Contribution to guest's surveys and/or comments (e.g. "Guest Satisfaction Survey", "Contact us"; "Guests comments")
- Subscription to newsletters, to receive e-mail offers or promotions, with your explicit consent
- Tour operators, travel agencies, GDS reservation systems
- Connection to any MERIDIAN LEISURE HOTELS websites (IP address, session cookies and Google Universal Analytics)
- Filling in of an online collection form (e.g. online bookings, questionnaire, forms)
- Use of a website managed by MERIDIAN LEISURE HOTELS, including [www.MeridianLeisureHotelsmanagement.com](http://www.MeridianLeisureHotelsmanagement.com)

## **COLLECTION OF PERSONAL INFORMATION VIA COOKIES**

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on [www.allaboutcookies.org](http://www.allaboutcookies.org). Personal Information regarding a user's journey through our websites is collected when visiting a hotel managed by MERIDIAN LEISURE HOTELS. The placement of cookies throughout websites managed by MERIDIAN LEISURE HOTELS, also allows MERIDIAN LEISURE HOTELS to enhance the effectiveness of social media advertising through the data and insight collected in relation to the user journey. This information is held for use in Google Universal Analytics to better understand customer behaviours and to better deliver our services. We use cookies to identify You when you visit a hotel website managed by MERIDIAN LEISURE HOTELS and to keep track of your browsing patterns and build up a demographic profile. Most browsers will allow you to turn off cookies. If you want to know how to do this, please look at the menu on your browser or look at the instruction on [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that turning off cookies will restrict your use of our website. For details on our Cookie Policy please visit <http://www.MeridianLeisureHotelsmanagement.com/policy/>

## **WHAT ARE THE PURPOSES OF DATA COLLECTION BY MERIDIAN LEISURE HOTELS?**

We use PI for the following purposes:

- To deal with Your enquiries and requests
- To book and reserve hotel rooms and requested accommodation or venue hire provision
- To establish and maintain business records and comply with accounting requirements and local regulations
- For back office processing; including managing a list of undesirable guests, further to a non-payment, or to improper behaviour
- To manage guests' complaints
- To track consumption (telephone, bar, Internet, pay TV)
- To let You benefit from our loyalty program
- To implement security and fraud prevention means
- Administering membership records

## **HOW MERIDIAN LEISURE HOTELS USE PERSONAL DATA FOR MARKETING PURPOSES**

- To process your PI in the Meridian Leisure Hotels Clients Relationship Management program
- To better understand your needs and requests and to tailor our products and services to better
- To send You newsletters, promotions and marketing material or contact you about tourism, hospitality or services, hotel promotions or about Meridian Leisure Hotels
- To conduct surveys and analyse guests' questionnaires and comments and activity patterns
- To secure and improve use of Internet websites including website navigation

Should you wish to discuss any query regarding use of Your data for marketing purposes, contact the Meridian Leisure Hotels Marketing Department on 01189 444232 or at Wharfedale Road, Winnersh RG41 5TS . Please note that we will only collect your PI with your explicit consent.

## **WHAT PERSONAL INFORMATION IS COLLECTED BY MERIDIAN LEISURE HOTELS?**

As a customer at a Meridian Leisure Hotels operated hotel, You may be asked, at various times, to provide PI about You and your family members, such as:

- Contact information, e.g. name, telephone numbers, e-mail addresses, postal addresses
- Other personal details: date of birth; nationality
- Child Information: name and birth date
- Credit card details (only in secure transactional related system)
- Membership card numbers of any loyalty program
- Your dates of arrival and departure
- Your preferences and interests, e.g. preferred location

of room (low floor, high floor), type of bed, preferred newspaper, sports and cultural interests • Any questions/comments You may have during or after your stay in one of our hotels

#### **COLLECTION OF SENSITIVE PERSONAL DATA**

In order to satisfy certain requests or to provide You with specific services during your stay, Meridian Leisure Hotels may collect data which may be considered sensitive including leisure habits, personal activities and hobbies, cultural habits, smoker/ non-smoker status. Meridian Leisure Hotels may collect data to facilitate certain dietary requirements or provide accessible access facilities during your stay in hotels under Meridian Leisure Hotels management. We do not knowingly collect PI from children under the age of 18, except name, date of birth and nationality as provided directly by an adult on their behalf or with an adult's permission. If You believe your child has submitted PI directly to us, please contact us so that we can delete such PI. We do not knowingly collect sensitive information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life details.

#### **SHARING OF YOUR PERSONAL INFORMATION**

At Meridian Leisure Hotels, we wish to offer you the same level of service and hospitality across all our hotels. We will not share your data with third parties unless we are obliged to disclose personal data by law, or the disclosure of national security, taxation and criminal investigation, or we have your consent, and to the following. These authorized individuals include (but is not limited to): • Meridian Leisure Hotels employees • Hotel reservation staff using Meridian Leisure Hotels reservation tools • Information technology staff and marketing department staff • Medical services • Legal Department staff • Any relevant individuals of any Meridian Leisure Hotels operated hotels' legal entities for specific categories of data, for a legitimate or lawful reason.

#### **DATA SHARING WITH THIRD PARTIES**

As a hotel management company, Meridian Leisure Hotels work closely with other third-party websites. Please note this Guest Privacy Policy does not apply to your use of these third-party websites. Please check the privacy policies of any other website before sharing your Personal Information. We may share your PI with external third parties for providing You with the requested services and improving your stay with us. Third party service providers may include (but is not limited to): booking engine providers (Sabre Hospitality Solutions), IT subcontractors, commercial partners, local authorities and any authority which we are required by law to do so.

#### **DATA SECURITY**

Meridian Leisure Hotels takes appropriate technical and organisational measures, in accordance with local law requirements, to protect your PI against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access. To this end, we have implemented technical measures such as firewalls and organisational measures such as a login/efficient password and physical protection.

#### **INTERNATIONAL TRANSFERS OF DATA**

We may transfer your PI to recipients, internal or external, which may be located in countries with different levels of PI protection. Therefore, in addition to the implementation of this Guest Privacy Policy, Meridian Leisure Hotels implements appropriate measures, including contractual clauses, to secure transfer of your PI to any Meridian Leisure Hotels entity or external recipient located in a country with a level of protection different from the one existing in the country in which the PI is collected.

#### **DATA STORAGE**

We will store your PI only for the time necessary for the purposes stated in this Guest Privacy Policy, or as permitted or required by any applicable law.

#### **RIGHTS TO ACCESS AND MODIFY YOUR PERSONAL INFORMATION**

You have the right to access, modify or delete Your PI at any time. You can also object to the processing of your PI held by Meridian Leisure Hotels as described in this Guest Privacy Policy provided that You have legitimate reasons or make a Subject Access

Request. However, please note that if You object to the collection of PI, we may, in certain circumstances be unable to provide You with services requested during your stay at a hotel under management by Meridian Leisure Hotels hotels. If You wish to exercise your rights on your PI held by a specific hotel, then You must contact the hotel managed by Meridian Leisure Hotels directly. To discuss access to PI held about You for marketing purposes or if You encounter any problem when exercising your rights, You can contact the dedicated Guest Data Services department of Meridian Leisure Hotels, contactable on +44 (0) 189 444241 or at Guest Data Services, Marketing Team, Meridian Leisure Hotels, Wharfedale Road, Winnersh Wokingham RG41 5TS. Meridian Leisure Hotels do not charge individuals for any requests made regarding collection of PI. In the interests of protecting the privacy of all Meridian Leisure Hotels guests, we will need to verify your identity properly prior to responding to your request. To this end, we may request a copy of a valid identification paper such as a current driver's license, identity card or passport. If your PI is not accurate, complete or up to date, please provide Meridian Leisure Hotels with your request for correction at the contact details outlined above. Any requests for correction will be dealt with as soon as practicable or in compliance with applicable law.

#### **UPDATES**

We may amend this Guest Privacy Policy from time to time. Therefore, we invite You to read this Guest Privacy Policy regularly and in any event when making a reservation in any Meridian Leisure Hotels hotels. This Guest Privacy Policy was last updated in May 2018.