

Privacy Policy

This Privacy Policy sets out how Fernbank Hotel uses and protects any information that you give Fernbank Hotel when you use our website www.fernbankhotel.co.uk, and when you contact us, whether by e-mail, post, fax or telephone using the contact options on the site, or when you contract with us for accommodation via any online travel agent site such as Booking.com. This Privacy Policy also provides certain information that is legally required and lists your rights in relation to your personal data.

We are committed to ensuring that your privacy is protected. We take our data protection responsibilities very seriously and we comply with all applicable Data Protection Legislation in force from time to time. For the purposes of this Privacy Policy, 'Data Protection Legislation' means: (i) the Data Protection Act 1998 ('DPA') and all related regulations in force from time to time; or (ii) with effect from 25th May 2018, the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) ('GDPR') and any laws in England giving effect to its provisions.

What we collect

The personal information we collect from you, or is voluntarily supplied by you, is used to enable us to provide the specific service you require. This information will only be used in the course of providing a service to you.

To be able to make a reservation we have to collect certain information from you and during such you are required to give your contact information. We use the information supplied by you to provide the service you request from us and as set out in this Privacy Policy.

We may collect the following personal data about you:

- Personal data you provide to us via our website, including information that you provide by filling in contact, booking or review forms on our site or third party reservation sites, or provided at registration and checking-in. For example:
 - Your name and title.
 - Your billing and postal address, phone and fax contact numbers and email addresses.
 - Reason for your stay with us such as a holiday, training or employer details.
 - Business information, such as employer details and job title, particularly from our corporate customers.
 - Transaction information, including payment and reservation and booking details.
 - Information about our services and your activities on site such as food purchases or allergy information or room preferences if you interact with us in this respect during or prior to your stay.
 - Information necessary for legal compliance such as disability or health information or identification information (such as passports, drivers' licences or national identity cards).
 - Personal data you provide when applying for a job advertised or submit a speculative job application and/or your CV.

Where you book accommodation for other people, we may ask you to provide the above information about them. We will usually ask for the title, first name and surname, e-mail address

and the nationality of a person for each room that you book for identification purposes. You should only provide us with information about other people if you have their permission to do so.

In the event that you make a reservation we may collect payment card type and number, expiry date, issue number, security number and name of card holder – we need this to secure the reservation and occasionally collect payment. We are compliant to the standards of the Payment Card Industry Security Standards Council for handling such data.

If you contact us we may keep a record of that correspondence.

Users may visit our website anonymously and can refuse to supply personal identification information, except that it may prevent them from engaging in certain website related activities.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (e.g. to provide you with accommodation services). In this case, we may have to cancel our supply of services to you but we will notify you if this is the case at the time. Please also see our booking Terms and Conditions.

We may collect non-personal identification information about users whenever they interact with our website. We may collect aggregate information and statistics for the purposes of monitoring our website usage in order to help us develop the site and our services. These statistics will not include information that can be used to identify any individual.

How we use the information we gather

For the purposes of the Data Protection Legislation, we are the controller of the personal data you provide to us (in the DPA this is referred to as a “data controller”) and as a controller we use (or ‘process’) the personal data we hold on you in accordance with this Privacy Policy.

If you have a concern or question regarding your privacy, including any requests to exercise your legal rights, you can contact our Data Protection Officer at Fernbank Hotel, 4 Fairfields Road, Basingstoke, Hampshire RG21 3DR.

The legal grounds for collecting and processing your personal data is set out in further detail below. In some cases, we may ask for your consent in order that we can process your personal data. However, in certain circumstances Data Protection Legislation allows us to process your personal data, without needing to obtain your consent. As examples, this may be because we need to use your personal data in order to provide you with the services you have elected to receive from us (i.e. in the ordinary course of our business), to operate our site or for legitimate business or legal purposes.

Our main use of your information is to process your reservation or to send you booking confirmation details, and if necessary to inform you of updates or changes to your travel plans, as well as to help us understand your needs and provide you with a better service, but the main uses in particular are for the following reasons:

- Internal record keeping.
- We may use information to help us respond to your inquiries, and/or other requests or questions.

- In order to perform our contractual obligations to you for services that you have placed with us and contacting you in relation to any issues with your reservation such as special requests you have made or an out of normal hours ETA. The processing is necessary for the performance of a contract which you have entered into, or where you request us to process your data prior to entering into a contract.
- We may use the information to improve our products and services and to ensure that content from our website is presented in the most effective manner for you and for your computer.
- In order to comply with our own legal obligations or to assist in an investigation (e.g. from the police). The processing is necessary for compliance with a legal obligation to which we are subject.

We do not modify, copy, distribute, license, sell or redistribute any of your personal information with any third parties except to the extent necessary to provide the service or unless required to as part of a lawful investigation.

We will not send any unsolicited direct marketing and/or e-mail marketing communications to you unless you explicitly give your consent.

How we collect your information

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your identity, contact and other details such as by filling in forms, making bookings or by corresponding with us by post, phone, email, our website or otherwise.
- Third-party interactions. As you place accommodation bookings (or even post material or feedback) with travel sites such as Booking.com or Expedia, they will securely pass information to us about you necessary to process your reservation and for us equally to fulfil our contractual obligations to each other.

Web browser cookies

A cookie is a small text file that can be stored by your browser on the device you use to access the internet and allows the browser to pass small amounts of information about user behaviour on the given website to a web server.

Our website will use cookies to monitor visits, enhance the visitor experience and ensure the smooth operation of our website. By continuing to browse our website you consent to the use of cookies.

You may set up your web browser to notify you of cookie placement requests or decline cookies completely (although declining them may mean that some parts of the website may not function properly or prevent you from being able to use the website at all).

We use third party web analytics services (for example Google Analytics, a popular web analytics service provided by Google, Inc.) to help us to analyse how users use our website. The service provider may be based outside the UK but your information will only be used for the purpose of evaluating your use of our website, compiling reports on website activity and providing other services relating to website activity and internet usage. The information is non-personalised.

If you want to delete or turn off any cookies that are already on your computer or stop future cookies, please refer to the instructions for your file management software or look at www.AboutCookies.org. Please remember that rejecting cookies may affect your whole internet browsing experience.

How we protect your information

To protect your information, we have put in place suitable physical, electronic and managerial measures to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place.

You should keep your own information secure and never divulge your information and passwords to any third party, as you will be liable for all activity and charges incurred through use of this whether authorised by you or not.

We use measures to ensure the privacy of the information provided to us and at no time are your debit/credit card details and personal information transmitted unencrypted over the internet.

Sharing your personal information

We do not sell, trade, lease or rent personal information to any other party and we will not share your personal information with outside parties for their marketing purposes except to the extent necessary to provide our contractual service or unless we are required to by law.

We may disclose your information to process and fulfil your reservation, to provide services you request, for internal business analysis purposes, for the purposes of fraud prevention or if Fernbank Hotel itself, is sold. We may share generic aggregated demographic information not linked to any personal information regarding visitors or website users with our business partners or data processors in order to better understand our services.

Third party websites

Our website may contain links to other websites of interest or of our partners, suppliers, affiliates and other third parties. However, once you have used these links to leave our site, you should note that we do not have any control over that website or links that appear on these websites, and we are not responsible for the practices employed by websites linked to or from our website. Please note that these websites have their own privacy notices which you should read and understand. We do not accept any responsibility for the use of any of your personal information whilst you visit these websites.

Storage of information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Your rights

You have the right in certain circumstances to obtain from us confirmation as to whether or not we are processing your personal data and, where that is the case, access such personal data and

be made aware of the information set out in this Privacy Policy in relation to such data. In order to process any of the rights, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

- Right to access your personal data in our possession.

At any point you can contact us to request details concerning the information we hold about you and a copy of such information, why we have that information, who has access to the information and details of the manner in which it was collected.

- Right to have inaccurate personal data rectified.

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated, though we may need to verify the accuracy of the new data you provide to us.

- Right to erasure (“right to be forgotten”).

This right enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be erased, usually for specific legal reasons.

- Right to restriction of processing.

This right enables you to ask us to stop or suspend the processing of your personal data in certain scenarios where we are able to comply unless we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

- Right to object to processing of personal data.

At any point you can object to processing of your personal information if you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Please note it is not possible to ‘opt-out’ of receiving communications from us which relates to your bookings, which are not considered as marketing for these purposes. This ensures that we can always contact you as a result of circumstances that may affect your stay with us and in order for us to improve our services to you going forward.

- Right to data portability.

You have the right to request that we transfer your data to another controller, in a structured, commonly used and machine readable format, where technically feasible to do so.

- Right to withdraw your consent to any processing for which you have previously given that consent.

You have the right to request that we stop profiling you in relation to any direct marketing practice and withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

- Right to make a complaint.

In the first instance we request you can make a complaint to us using the contact details at the bottom of this privacy statement.

You also have the right to make a complaint to the data protection supervisory authority if you consider that we have infringed applicable data privacy laws when processing your personal data. In the UK, this is the Information Commissioner's Office, who can be contacted using the following link: <https://ico.org.uk/>.

You will not have to pay a fee to access your personal data, or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We will aim to respond to all legitimate requests within 30 days. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this scenario, we will notify you and keep you updated.

Changes to this Privacy Policy

We may update this privacy statement from time-to-time and in line with required changes in law. If we decide to change our Privacy Policy, we will post these changes on our website. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access our website. By using our website, you signify your acceptance of the terms of this policy.

These terms were most recently updated on 24th May 2018.

Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us:

Data Protection Officer, Fernbank Hotel, 4 Fairfields Road, Basingstoke, Hampshire RG21 3DR.