

GDPR – Data Protection

The Cary Arms Hotel and Spa Limited are committed to ensuring the safe, secure and proper use of individual data and promoting a positive culture of Data Protection Compliance

Data Protection Lead – Mr Andy Banner-Price will act as Data Protection Lead for **The Cary Arms Hotel and Spa Limited**

See Enclosed for Further information on our policies and procedures for complying with the GDPR regulation as outlined below: -

Audit Map of Data Flow

Data Policy

3rd Party Consent Information – Suppliers, Staff, Customers

ICO Registration

Privacy Notices & Display

Data Processes

- Recognise & respond to data access requests
- Ensuring only current and up to date data is held

Data Protection Policy

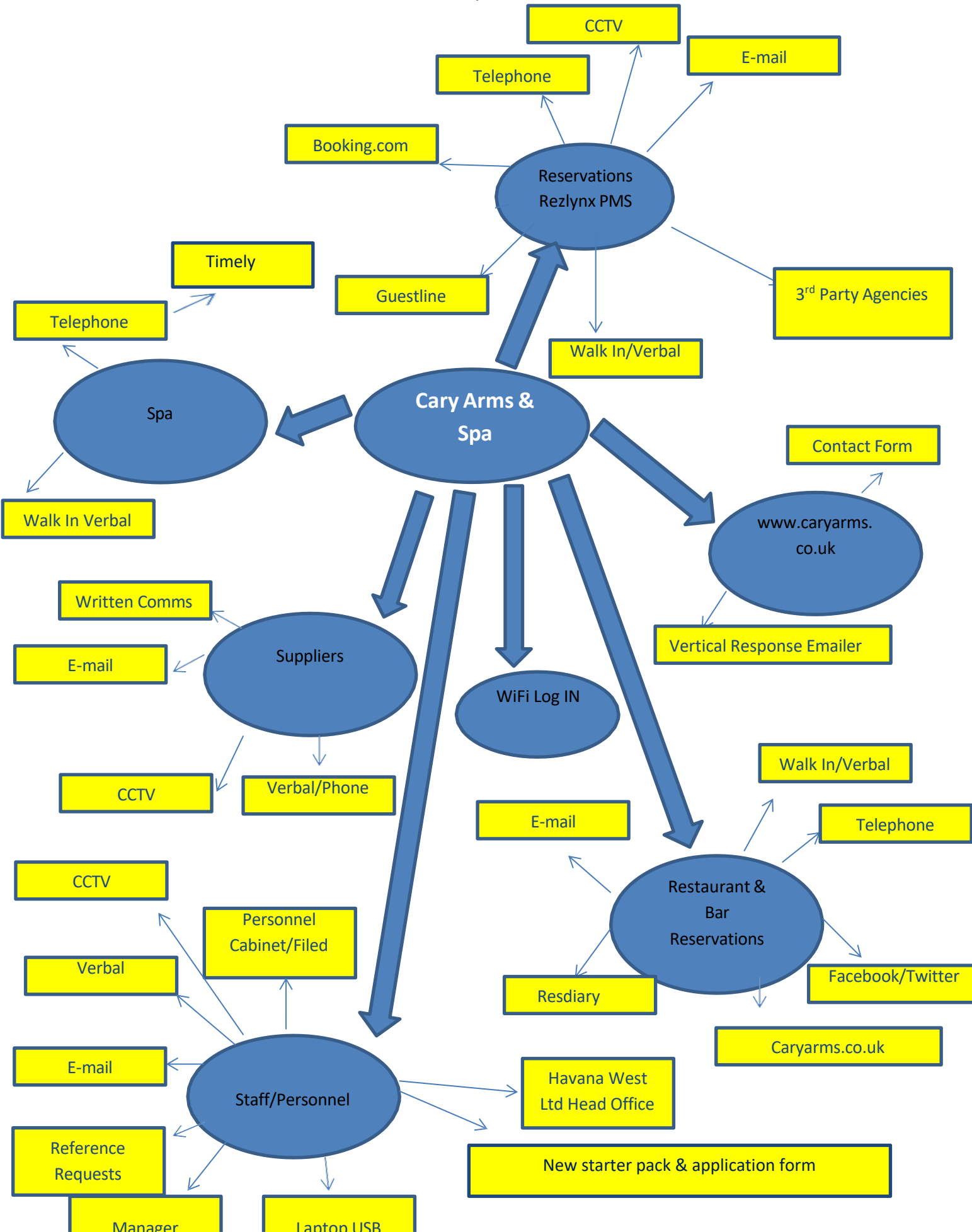
Data Handling & Security Training & Review

Written contract with data processors

Management responsibilities – Promoting a positive culture of data protection compliance

Security Policy & Breach Notifications

Data Map – Audit



Data Protection Policy – Privacy & Security

Who are we:

In this policy whenever you see the words 'We' 'Us' or 'Our' it refers to **The Cary Arms Hotel and Spa Limited** registered with the ICO as a data controller.

The Cary Arms Hotel and Spa Limited Registered in England Number 09386590 offers a range of products and service within hospitality and leisure. Including but not limited to bedrooms, private events, restaurant, bar and spa.

Our full legal entity is:

The Cary Arms Hotel and Spa Limited Registered in England Number 09386590 c/o Bishop Fleming, 10 Temple Back, Bristol, BS1 6FL

Your Acceptance of this policy and our right to change it:

By using our website, social media pages, entering a competition or providing your information you consent to our collection and use of information you provide in the way(s) set out in our policy. If you do not agree to this policy please do not use our sites, social media pages or services.

We may make changes to this policy from time to time, if we do so we will post the changes on this page and they will apply from the time we post them.

What is personal data:

Information that can be used to help us identify any individual, such as name, address, phone number or e-mail address.

The Policy:

It is important that you read and understand what information we hold, how we may use it and what your rights are. This policy applies to our website, our use of e-mails and postal communication for the use of marketing and any other information we use for collecting information. It covers what we collect and why, what we do with the information and what rights you have.

What information we collect and why:

We will only ever collect the information we need including data we require to process reservations in our inn, cottage, restaurant or spa in general this will help us contact you if needed in the future. Non personal data may also be requested which may be used to help us improve our products and services.

Personal information such as name, postal address, phone number, e-mail address and credit card information or bank details for payments will be collected in connection with specific reservations made at the hotel or to make payments to you if you are an employee or supplier. We may also need to contact you or your business with queries and questions relating to our business needs.

You do not have to part with any of this information to browse our sites or facilities. However if you choose to withhold requested information we may not be able to provide you with certain products or services.

What do we do with the information:

We will use your information: -

To fulfil your requests such as reservations in our inn, cottage, restaurant or accepting the terms of using our spa.

This could also include contacting you following competition entries.

Process sales transactions or other payments and verify financial transactions

Identify visitors

Communicate with you about products or services purchased

Communicate with you about offers and promotions if you have actively agreed to it

Keep a copy of any written contact we have with you.

Provide an enhanced personalised service to you whilst enjoying our facilities

Monitor our complimentary guest wi-fi network to detect fraud, or other abuses or illegal activities

Using your information for marketing:

From 2nd May 2018 **The Cary Arms Hotel and Spa Limited** moved to an “opt-in” only marketing and communication policy. From 25th May 2018 we will only send marketing information to people who have agreed to us doing this. We will only do this in ways previously agreed.

If you want to receive our marketing information you can contact us on 01803 327110 or sign yourself up by logging on to our website www.caryarms.co.uk

Sharing your information:

We will only share your information if: -

We are legally required to do so by law enforcement agency or similar

We believe it is necessary to protect or defend our rights, people or visitors

We will only ever share your data with those responsible for storing this on our behalf examples would be the data centre for our property management system and Email Brilliance our newsletter provider.

We may also disclose or transfer your personal information to third parties in the event that we sell all or part of our business or assets. For example, we may disclose your personal information to a prospective or actual buyer where customer information forms part of the business assets being transferred.

We will take all reasonable steps to ensure that any necessary 3rd Party with whom we are required to share your data (as part of a systems agreement or similar) abide by the requirements of the data protection act, will only use the information for purposes for which it was supplied and not for any other reason. As part of our policy we will be requesting assurances from these companies that they have adequate measures in place to ensure data privacy and security.

We will do our best to ensure that the companies with whom we are obliged as part of our business practice to share data with are compliant with current legislation. Unfortunately this sharing does take place across the internet which is not always completely secure and may be beyond our control, we cannot therefore guarantee that loss, alteration of data or misuse will not occur in data transfer.

Only a limited amount of personal data including names and contact details are stored locally on site with the computers used for accessing this being on a secure network and password protected only by authorised personnel.

What we do with your information:

Your information will be solely used for purposes that enable us to fulfil our contracted obligations with you, from time to time if you have 'opted in' we will send you relevant information on current offers and promotions.

Your rights:

The data protection act gives you certain rights over your data and how we use it. These include: -

The right to have inaccurate personal data rectified, blocked erased or destroyed

The right to prevent your data being used for direct marketing

The right of access to a copy of the information we hold about you (subject access request)

If you wish to exercise any of your rights please contact the data protection lead in writing at **The Cary Arms Hotel and Spa Limited** Babbacombe Beach, Devon, TQ1 3LX or by e-mailing enquires@caryarms.co.uk it is our policy to charge the statutory maximum fee of £10 for subject access requests.

For further information about your rights under the data protection act please visit ico.org.uk

Data Consent Form – Suppliers/Staff

Please note as part of our policy before 25th May 2018, customers currently on our marketing database will be contacted offering them to OPT IN to continuation of marketing e-mails. Any previous guest registered on our data base not OPTING IN will be automatically removed from the database.

As a member of staff or supplier to/at The Cary Arms Hotel and Spa Limited we store a certain amount of 'data' on you/your company. Including but not limited to: -

Name, Address, Telephone Number, e-mail Address, Date of Birth or Company Registration Numbers, bank details to process payments to you.

In order to fully comply with the General Data Protection Regulation (GDPR) which will replace the 1995 Data Protection Directive we must ask for your permission to store and process your personal and sensitive data.

What is personal and sensitive data:

Data that can be used to identify you or your organisation, including but not limited to those items outlined above.

Where will you store my data:

The records will be stored on business computers which are password protected, some hard copies of personal data will be stored in personnel files and supplier files these will be secure and only accessed by authorised staff. For employee data will also be shared with the current payroll & pension provider.

How will my data be used:

Data collected will only be used for purposes necessary for us to fulfil our business obligations to either you as an employee or as a supplier. Your data will only be shared if in the interests of yourself or the business this needs to be, if legally obliged to do so, or with companies requesting references following your departure.

Can I withhold my consent:

Yes but please keep in mind that it may become difficult for us to continue employment or purchase your products without consent.

Obtaining the information we hold about you:

You can make an access request for the data we hold about you, although for suppliers there is a fee of £10 to cover administration. Requests can only be made in writing by post or e-mail.

Declaration:

I/we have reads and understood the information outlined above and agree to give **The Cary Arms Hotel and Spa Limited** Permission to store and process my personal data.

Name:

Business:

Sign:

Date:

ICO Registration

Re-Registered 2nd May 2018

