



PENVENTON

— PARK HOTEL —



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# Privacy Policy

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## **Penventon Park Hotel (1970) LTD Privacy Policy**

This privacy policy explains how Penventon Park Hotel uses and protects any information provided for your stay.

Penventon Park Hotel are committed to ensuring that your privacy is protected in accordance with the General Data Protection Regulations Act 2017.

### **1. Who We Are**

- Penventon Park Hotel (1970) Limited trading as: Penventon Park Hotel
- Penventon Park Hotel is the data controller

### **2. Data Protection Notice**

Penventon Park Hotel collects personal information from you if you register online with us or carry out transactions for goods and services via our website or hotel.

We use the personal information collected for the purposes of:

- providing reservation and booking services for our venues;
- internal analysis, advertising & marketing purposes;
- keeping records and accounts;
- crime prevention and detection (including CCTV at hotel sites).

Data is shared with for marketing purposes and only to third parties, under specific contract terms, whose services we employ to conduct our business and in relation to any supply of products and/or services by us.

If you do not wish to receive marketing communications from Penventon Park Hotel please opt out of our advertising and marketing communications at any other time by any of the following methods:

- selecting the UNSUBSCRIBE link included in our emails or on our website;
- editing your Penventon Park Hotel website account profile to change your communication preferences;
- contacting the hotel in writing

Should you have concerns about our processing of your personal data, please contact the General Manager. For more information explaining how we use your information, please see our Privacy Policy.

General Manager, Penventon Park Hotel, West End, TR15 1TE, [marketing@penventon.com](mailto:marketing@penventon.com)

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### 3. Transaction & Information Security

We understand how important it is to securely store any information that you provide. At Penventon Park Hotel we take the privacy and security of your payment and personal details very seriously. Although we take reasonable care to keep your personal data secure, we cannot be held liable for any loss you may suffer from unauthorised access or loss of any data provided to 3<sup>rd</sup> party websites.

As part of our security measures, we use encryption technologies for online transactions via our websites. You can tell whether a page is secure as 'https' will replace the 'http' at the front of the [www.penventon.co.uk](https://www.penventon.co.uk) in your browser address window. A small locked padlock will also appear either in the bottom bar of your browser window or alongside the browser address, depending upon which browser software and version you are using.

Should you choose to store your credit card details with us via your website user account, for the purpose of making future booking transactions, we will store this information with our secure third party payment gateway which is accredited for PCI DSS (Payment Card Industry Data Security Standards).

### 4. What Information We Collect

- **Full Name** which we collect from you on a legal basis for the Immigration & Hotels Records Order 1972. We store this information electronically on our Hotel System as well as paper records for your reservation, including our arrivals & departures lists, registration documents and our lost property book and/or handover diary if required.
  - We store these details for 3 years electronically and the paper records for 5 years, after the 3 years our Hotel System will automatically remove all of your records. After 5 years all paper records will be destroyed accordingly.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services/ Computer & Hotel System Support
- **Address including postcode** which we collect from you on a contractual basis. We store this information electronically on our Hotel System as well as paper records for your reservation, including confirmation and registration forms.
  - We store these details for 3 years electronically and the paper records for 5 years, after the 3 years our Hotel System will automatically remove all of your records. After 5 years all paper records will be destroyed accordingly.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services/ Computer & Hotel System Support

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- **Telephone number** which we collect from you on a contractual basis.
  - We store this information electronically on our Hotel System as well as paper records for your reservation, registration documents and our lost property book and/or handover diary if required.
  - We store these details for 3 years electronically and the paper records for 5 years, after the 3 years our Hotel System will automatically remove all of your records. After 5 years all paper records will be destroyed accordingly.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services/ Computer & Hotel System Support
- **Email address** which we collect from you on an explicit consent basis, we will always ask you for consent to use your email address when booking direct with us over the phone.
  - If you have booked online on our website we will obtain your email address if you have submitted this online during your reservation process, however we will not use this information until we gain your consent on arrival on a consent basis.
  - If you have booked online via Booking.com/ Expedia/ Hotels.com we do not receive your email address from these booking services therefore we collect this information on your arrival on a consent basis.
  - We store this information electronically on our Hotel System for 3 years & **IN TOUCH** online mailing list for 2 years. After this our system will automatically remove your records.
 

The only exception to this is if you have registered on our website to receive our Monthly Newsletters, we will store your email address on our **IN TOUCH** mailing list indefinitely until you wish to unsubscribe which you can do so on any of the email Newsletters you have received or mark our email newsletter as spam which will add your email address to a suppressed list indefinitely to ensure you never receive our emails.
  - Who processes this data- You (when booking online or registering for our newsletter), booking services and Penventon Park Hotel Reception Staff.
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services, Sales & Marketing Staff, Computer & Hotel System Support

- **Full card details** which we collect from you on a contractual basis, either to secure your reservation or to take payment in advance.
  - We store this information electronically on our Secure Property Management System server which is accessible via our Hotel System. If you have booked online on any website your card details are stored electronically on our secure Channel Manager website "Siteminder" you can find their privacy policy at: <https://www.siteminder.com/legal/privacy/>  
All card details stored on Siteminder are only stored up until your arrival and 1 day after your departure date. All card details stored on our Secure Property Management System server are retained for 30 days after your departure date. After the 1 or 30 days your card details are automatically removed off both electronic systems.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services/ Computer & Hotel System Support
- **Other information relevant to customers stay** Reason for stay (Birthday, Anniversary, Wedding etc) Time of arrival. We collect this information from you on a legitimate interest basis.
  - We store this information electronically on our Secure Property Management System as well as paper records for your reservation.
  - We store these details for 3 years electronically and the paper records for 5 years, after the 3 years our Hotel System will automatically remove all of your records. After 5 years all paper records will be destroyed accordingly.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Booking Services/ Computer & Hotel System Support
- **Health / Medical comments or dietary requirements** we collect this information from you on an explicit consent basis.
  - We store this information electronically on our Secure Property Management System as well as paper records for your reservation.
  - We store these details for 3 years electronically and the paper records for 5 years, after the 3 years our Hotel System will automatically remove all of your records. After 5 years all paper records will be destroyed accordingly.
  - Who processes this data- You (when booking online), booking services and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager, Reception Staff, Food & Beverage Staff, Leisure Club Staff, Booking Services, Computer & Hotel System Support

- **Passport** we collect this information on a Legal basis, in accordance with the Immigration & Hotels Records Order 1972. It is a legal requirement for us to gather passport details including your next destination from all non UK residents', we will obtain this for all non UK guests over the age of 16.
  - We store these details on paper records which are securely stored at the Hotel for 5 years, after the 5 years all paper records are destroyed accordingly.
  - Who processes this data- You and Penventon Park Hotel Reception Staff
  - Who has access to this data- Penventon Park Hotel Directors, Manager and Reception Staff.
- **Unique MAC/ IP Address** we collect this information from you on a contractual basis. This data will be stored electronically on a LAN connected computer at Penventon Park Hotel for 30 days, after this time your details will be automatically deleted.
  - Who processes this data- You (the guest) by accepting the Terms of Use of our Wi-Fi.
  - Who has access to this data- Penventon Park Hotel Directors, Manager & Reception Staff, Computer & IT Support
- **Vehicle Registration** we collect this information from you on a legitimate interest basis.
 

This data will be stored electronically on a LAN connected computer and on a paper registration list at Penventon Park Hotel and only retained during your stay, once you have departed this information is deleted from our computer and paper forms are shredded daily.

  - Who processes this data- You & Reception Staff.
  - Who has access to this data- Penventon Park Hotel Directors, Manager & Reception Staff, Computer & IT Support
- **CCTV Images** we collect this data on a legitimate interest basis for the safety of our guests.
  - This data will be stored electronically on a computer at Penventon Park Hotel and retained for 28 days, after the 28 days the data is automatically deleted off the system.
  - Who processes this data- Penventon Park Hotel
  - Who has access to this data- Penventon Park Hotel Directors, Manager & Reception Staff/ Computer & IT Support

## 5. When Making A Hotel Reservation On Our Website

by clicking 'BOOK A ROOM' you will be sent to a 3<sup>rd</sup> party website called Siteminder, the website address is:

<https://app.thebookingbutton.com/properties/penventondirect>

This website is used to create your hotel stay, gather all of your details which they then send us directly onto our Hotel system to create your hotel reservation. Your

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reservations details will also be on Siteminder's website which can only be accessed by the Hotel with the secure log in details.

Siteminder is a national company who have their own privacy policy which can be found by following the link; <https://www.siteminder.com/legal/privacy/>

Please note if you have booked via a 3<sup>rd</sup> party website called Booking.com your personal data supplied to them during your booking process is not all passed onto us, we only receive your name, number if supplied, card details for payment in advance and address if supplied. We will gather all other information from you on arrival.

If you have booked via a 3<sup>rd</sup> party website called Expedia/ Hotels.com your personal data supplied to them during your booking process is not all passed onto us, we only receive your name and number and will collect all other information from you on arrival (Please note when booking with Expedia/Hotel.com you pay them when booking not Penventon Park Hotel therefore we will not have your card details stored)

#### **6. When Making A Restaurant Reservation On Our Website**

by clicking 'BOOK A TABLE' you will be sent to a 3<sup>rd</sup> party website called OpenTable, the website address is:

<https://www.opentable.com/r/penventon-park-hotel-the-restaurant-reservations-redruth>

This website is used to create your restaurant reservation, gather all of your details which they then send us directly onto our booking system to create your reservation. Your reservations details will also be on OpenTable's website which can only be accessed by the Hotel with the secure log in details.

OpenTable is a national company who have their own privacy policy which can be found by following the link: <https://www.opentable.com/legal/privacy-policy>

#### **7. When Making A Special Event Reservation On Our Website**

by clicking on certain 'UNIQUE/ SPECIAL EVENTS' you will be sent to a 3<sup>rd</sup> party website called Event Brite, the website address is:

<https://www.eventbrite.co.uk/o/penventon-park-hotel-14291358098>

This website is used to create your special event reservation, gather all of your details which they then send us directly onto our booking system to create your reservation. Your reservations details will also be on Event Brite's website which can only be accessed by the Hotel with the secure log in details.

Event Brite is a national company who have their own privacy policy which can be found by following the link below;

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lq=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lq=en_GB)

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## 8. Newsletters from Penventon Park Hotel

On our website on our "Sign up for News & Offers" is for customers signing up to receive our Monthly Email newsletters and must give explicit consent to do so. The information collected is sent to a 3<sup>rd</sup> party company and added to our subscribers list. This company is called IN TOUCH who have their own privacy policy which abides by the current Data Protection Act which can be found by following: <http://weareintouch.co.uk/privacy-policy>

*Note that access to this website is limited by secured access only by account users.*

What Information We Collect And Why: We collect your email address on a legitimate interest basis, by you providing us with your email address and giving us consent to use in order for you to receive our latest news and offers

How Long We Store This Information For: If you have signed up to receive these newsletters you will be on the mailing list indefinitely or until you decide you no longer want to receive them, at this point you simply select 'UNSUBSCRIBE' on one of our email address and all your email address will be added to a suppressions list which is stored on **IN TOUCH** database and retained indefinitely to ensure your email address is not used again by Penventon Park Hotel.

## 9. Google Analytics

When you visit our website your analytic data will be stored with Google Analytics, this doesn't hold any person data like name, address or phone number but does use cookies from your computer or mobile device to track the general traffic on our website.

Google Analytics have their own privacy policy that complies with General Data Protection Regulations which can be found by following the link below; <https://www.google.com/policies/privacy/>

What Information We Collect: General number of visits to website, What pages were visited, Geographic information, where the site was accessed, Average time spent on website, From what other website, if any, you found our website. This data is held for 26 months on Penventon Park Hotel secure log in on Google Analytics website which after this time is automatically deleted.

- Who processes the data- You
- Who has access- Penventon Park Hotel Directors, Manager & Marketing Department has access to this as well as Sam Amps Marketing our outsourced Google Analytic Assessor, their privacy policy can be found at: <https://samampsmarketing.com/privacy-policy/>

## 10. Social Media

If you choose to connect with us via social media links, for example such as Facebook or Twitter, we may collect your user name, your name (including surname) and email address, your gender, and your location. We may also collect your birthdate and other significant dates for making special offers to you around your birthday and other anniversaries.

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## **11. Guest WIFI**

Our guest Wi-Fi service is provided either by a contracted trusted third party. If you choose to use the service to access web sites or content provided by third parties or purchase products from third parties, then your personal information may be available to the third-party provider. The way third parties handle and use your personal information related to the use of their services is governed by their policies. Penventon Park Hotel has no responsibility for their policies, or third parties' compliance with them.

Whilst we take reasonable, appropriate technical and organisational measures to safeguard the personal data that you provide to us, no transmission over the internet can ever be totally guaranteed secure. Consequently, please be aware that we cannot guarantee the complete security of any personal data that you transfer over the internet to us whilst in transit. Sending such information is entirely at your own risk.

## **12. Cookies**

We use cookies on our website to enhance your experience with our brand. A cookie is filled with data files that are placed on your computer or portable device each time you visit a website. They are stored on your web browser and enable us to personalise your experience when you visit our website. You are welcome to change your browser settings to not accept our cookies; should you choose to do this you may find that the functionality of our websites is reduced.

## **13. Your Privacy Rights**

We do not sell or lease any personal information to any 3<sup>rd</sup> parties. You can request any details of your personal information which we hold about you under the General Data Protection Regulation 2017. If you would like a copy of the information we hold please write to us or email us on the address below.

If you believe any of the information we hold for you is incorrect or incomplete please email or write to us on the address below as soon as possible and we will promptly correct any information that's found to be incorrect.

General Manager, Penventon Park Hotel, West End, TR15 1TE, [marketing@penventon.com](mailto:marketing@penventon.com)

## **14. Penventon Park Hotel GDPR Documentation**

The full business policies and procedures may be viewed at the hotel by writing in a request to:

General Manager, Penventon Park Hotel, West End, TR15 1TE, [marketing@penventon.com](mailto:marketing@penventon.com)