

PRIVACY POLICY for Guests

POFR CIC is a company registered in England and Wales which trades under the name of CLASSIC HOTELS (referred to as "we" or "us" in this policy).

OVERVIEW

Maintaining the security of your data is a priority at Classic Hotels and we are committed to respecting your privacy rights. We will endeavour to handle your data fairly and legally at all times. We are also dedicated to being transparent about what data we collect about you and how we use it.

This policy applies to all our guests, visitors or users of our hotels or websites, including use of your mobile device or going online on our premises.

This policy provides you with information about:

- how we use your data
- what personal data we collect
- how we ensure your privacy is maintained
- your legal rights relating to your personal data.

GENERAL

We collect your personal data and it is used:

- to provide hotel services for you
- to contact you electronically about promotional offers which we think may interest you
- to administer any membership or loyalty scheme which may apply
- to improve our website for you
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

MARKETING COMMUNICATIONS

We do not sell or rent your data to other third parties for marketing purposes.

We may hold your email address for electronic marketing purposes, if you have provided it to us. We will use your email address to send you details of offers which we think may be of interest to you.

You have the right to opt out of receiving promotional communications at any time by simply clicking the "unsubscribe" link which is in all our promotional emails. Or you may email marketing@pofr.co.uk to ask to opt out of receiving promotional emails.

Please note that even if you opt-out of receiving marketing email communications from us, we may still need to send you service-related communications, such as confirmations of any future reservations you make.

All POFR Legacy members are sent Legacy Newsletters by post. The POFR Legacy Newsletter is the method by which we communicate with members. It also contains members' offers.

SHARING YOUR DATA

Oodles.club

We may share your some of your personal data with our chosen loyalty scheme provider, Oodles.Club. We only allow Oodles.Club to handle your specific personal data necessary to offer you the opportunity to join Oodles.Club, or to add or redeem Oodles points if you are already an

Oodles.Club member. We have confirmed that they apply appropriate data protection and security controls.

We may share your data with:

- third parties which we choose to use in order to administer and manage our business. We do not authorise these third parties to use your information for purposes other than for which it has been provided, and do not authorize these third parties to disclose that information to unauthorized parties. We require these third parties to maintain appropriate security to protect your information from unauthorized access or processing.
- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -
 - to comply with our legal obligations
 - for the protection of our employees and other guests
 - to exercise our legal rights (for example in court cases)
 - for the prevention, detection, investigation of crime or prosecution of offenders.
- We may disclose or transfer your information to a third party if we sell, transfer, divest, or disclose all or a portion of our business or assets to another company in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding.

WHAT INFORMATION DO WE HOLD?

We may hold the following information about you:

- your name, age/date of birth and gender
- your contact details: postal address telephone numbers (including mobile numbers) and e-mail address
- your food preferences, food allergies, accessibility requirements
- your vehicle registration number, your passport number, nationality
- your employer/group, your job title/position within group
- details of future and previous reservations or event bookings and relevant communications
- your image may be recorded on CCTV when you visit one of our hotels
- your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback
- billing information which may include your payment card details may be taken by us. However, these details are not held directly by ourselves, but are held in a secure and encrypted format by an approved payment gateway provider which meets UK legal requirements for your safety and security
- for POFR Legacy Members only:
 - your membership number, renewal date
 - your pension number and pension provider contact details, where you have chosen to pay membership subscriptions by pension deduction.
- your communication and marketing preferences
- your correspondence and communications with us.

This list is not exhaustive and in specific instances, we may need to collect additional data for the purposes set out in this Policy.

Our websites are not intended for children and we do not knowingly collect data relating to children.

Our hotels venues or our own website may advertise or have links to other companies' websites, including social media sites. They may also collect, use, and share information about you. This Policy does not cover such third parties. or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

LEGAL BASIS

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent. For example, when you tick a box to receive promotional emails.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you make a booking with us, we will collect your email address to send confirmation to you.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your reservation history to send you appropriate offers.

HOW WE USE YOUR INFORMATION

We may use your information for the following purposes to: provide you with the services, products, and functionality offered at our hotel venues and fulfill your requests, including, but not limited to, making reservations, reviewing your experience at our venues, paying for services, communicating with you about your reservation or booking or use of our hotels, services, products and/or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special offers and other marketing communications; operate and improve our hotels or website, products, services, and functionality; process and deliver membership or loyalty schemes, authenticate your credit or debit card account information, and deter against fraudulent, unauthorized, or illegal activity; comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfill the requested purpose of collection. Classic Hotel takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

YOUR RIGHTS

You have the following rights:

- the right to ask what personal data that we hold about you at any time, subject to a fee specified by law (currently £10)

- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge
- the right for your personal data to be deleted, subject to certain restrictions such as accounting requirements
- the right to opt out of any marketing communications that we may send you.

If you wish to exercise any of the above rights, please contact us using the contact details set out below.

Your details may be retained for a period of up to 7 years for accounting purposes.

COOKIES

Our websites use cookies to collect information. This includes information about browsing and purchasing behaviour by people who access our websites. This includes information about pages viewed, products purchased and the customer journey around our websites.

What are cookies?

Like most websites, our own use cookies to collect information. Cookies are small data files which are placed on your computer or other devices (such as smart 'phones or 'tablets') as you browse this website. They are used to 'remember' when your computer or device accesses our websites. Cookies are essential for the effective operation of our websites. They are also used to help us improve the guest experience on our websites and elsewhere.

Information collected

Some cookies collect information about browsing and online behaviour on our websites when you access our website via the same computer or device. This includes information about pages viewed and your journey around a website. We do not use cookies to collect or record information on your name, address or other contact details.

Disabling cookies

You are able to disable cookies by changing your website browser settings to reject cookies. How you can do this will depend on the browser you use

CONTACT INFORMATION

If you have any questions about how Classic Hotels use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: 01386 882 621
- e-mail us: companysecretary@pofr.co.uk
- write to us at: Head Office, Dumbleton Hall Hotel, Dumbleton, Evesham, WR11 7TS

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>