

DATA PROTECTION

Leisure and Care Ltd. Privacy Notice

Leisure and Care Ltd. - and its affiliate C+C Bespoke Events - respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

Important information and who we are Purpose of this privacy notice

This privacy notice aims to give you information on how Leisure and Care Ltd. collects and processes your personal data that you may provide to us whether through the website, directly over email, through a third party booking agent, over the phone or otherwise before, during or after your visit to our hotel.

Controller

Leisure and Care Ltd is a controller of your data and is therefore responsible for your personal data ("L&C" or "we"). We are registered with the Information Commission and our registration number is A8313398

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us:

- by email: <u>i</u>nfo@leisureandcare.com
- by telephone: +44 (0)7946165564
- by post at: Leisure and Care Ltd., 38 Prentis Road London SW16 1QD

Changes to the privacy notice and your duty to inform us of changes. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

| Identity Data | Includes name, business card details |
|----------------|--|
| Contact Data | Includes address, email address and telephone numbers |
| Passport Data | Includes a copy of your passport or international driving licence if you are a non-UK resident |
| Financial Data | Includes bank account and payment card details |

| Transaction Data | Includes details about payments to and from you and other details of services that you have received at Ampersand |
|------------------|---|
| Marketing Data | Includes your preferences in receiving marketing from us |
| Sensitive Data | If you choose to give it to us, we may collect data that is considered to be sensitive such as data about your health or particular health requirements, your religious beliefs or other such sensitive data. |
| | We do not generally require this information and we only collect it if you choose to give it to us and because you think that it will assist us in making your visit to us more comfortable or more personalised. We only collect this information where you choose to give it to us on the basis of the provision of a particular service you have asked us to provide. |

If you fail to provide personal data

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 (for example, to book you a room or a dinner reservation). In this case, we may have to cancel the contract we have with you but we will notify you if this is the case at the time.

How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact, Financial, Profile, Passport, Correspondence and/or Special Categories of Personal Data in person, by filling in registration forms at Ampersand or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- book a stay or a meal or a visit or other service with us;
- provide us with special requests when you book a service with us;
- subscribe to our newsletter;
- request marketing to be sent to you;
- give us some feedback.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide the service under the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In respect of your Sensitive Data, we will only collect this from you where you provide this information voluntarily because you think that we need to be fully informed of the specific service that you are asking us to provide. Where you do so, we will take this as a clear affirmative action signifying your agreement to the processing of your Sensitive Data. You may withdraw our right to process your Sensitive Data on your behalf at any time.

Generally we do not otherwise rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--|--------------------|--|
| To register your booking or to register your name for | (a) Identity | (a) Performance of a contract with you |
| a given service (hotel/apartment booking; other services) | (b) Contact | (b) Necessary to comply with a legal obligation |
| | (c) Passport | (c) Where you have consented to the |
| | (d) Sensitive | specific processing of your Sensitive Data for the provision of a particular service to |
| | (e) Correspondence | you |
| To process payments for our services including: | (a) Identity | (a) Performance of a contract with you |
| (a) Manage payments, fee | (b) Contact | (b) Necessary for our legitimate interests (to recover debts due to us) |
| and charges | (c) Financial | |
| (b) Collect and recover money owed to us | (d) Transaction | |
| | (e) Communications | |
| | (f) Passport | |
| To manage our relationship with you | (a) Identity | (a) Performance of a contract with you |
| which will include: | (b) Contact | (b) Necessary to comply with a legal obligation |
| (a) Confirming your stay or booking with us | (c) Profile | (c) Necessary for our legitimate interests |
| (b) Communicating with | (d) Marketing | (to keep our records updated and to study how guests and customers use our |
| you about your requests and preferences | (e) Communications | services) |
| (c) Notifying you about changes to our services, our terms or privacy policy | (f) Sensitive | (d) Where you have consented to the specific processing of your Sensitive Data for the provision of a particular service to you |
| (c) Asking you to leave a review or take a survey | | |

| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
|--|---|---|
| To make suggestions and recommendations to you about services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our services and grow our business) |

Promotional offers from us

We may use your Identity and Contact to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or booked a visit to us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have chosen not to opt out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your other arrangements with us.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share part of your personal data with the necessary service providers involved in your event or trip organised by us.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

| known as a "data subject access request") | This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. |
|---|---|
| - | This enables you to have any incomplete or inaccurate information we hold about you corrected. |

| Request erasure of your personal information | This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). |
|---|--|
| Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. | You also have the right to object where we are processing your personal information for direct marketing purposes. |
| Request the restriction of processing of your personal information | This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. |
| Request the transfer of your personal information to another party. | This enables you to seek a transfer of your personal data to a third party elected by you. |
| Complain to the Information Commissioner's Office (ICO) | If you have a complaint about the way in which we are managing and processing your personal data. |

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

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the 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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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

Changes to this policy:

Any changes we may make to this policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.