

Privacy Policy

WATERFRONT HOTELS (SOUTHPORT) LIMITED is responsible for your personal data. Your data will be controlled by WATERFRONT HOTELS (SOUTHPORT) LIMITED that is providing services to you or communicating to you and is therefore regarded as an independent data controller of your personal data. We may update this Policy from time to time, if we make material changes you will be notified if you have subscribed to our mailing list.

Explanation of applicable data

For the purpose of this policy, personal data refers to information that relates to an identifiable, living individual, including information such as an online identifier for example an IP address. The General Data Protection Regulations (GDPR) applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data.

Data referred to in the GDPR as 'special categories of personal data' (previously termed 'Sensitive Personal Data') specifically includes the processing of genetic data, biometric data and data concerning health matters.

"Personal information" is therefore any information that can be used to identify you or that we can link to you and which we at WATERFRONT HOTELS (SOUTHPORT) LIMITED have in our possession or control.

The information we collect and where we get it

WATERFRONT HOTELS (SOUTHPORT) LIMITED collects and therefore processes the following personal information about you:

- * Contact details and basic personal information (for example, last name, first name, telephone number, email)
- * Passport details
- * Information relating to your children (for example, first name, age)
- * Your credit card number (for transaction and reservation purposes)
- * Your membership number if you are a member of our loyalty program.
- * Your arrival and departure dates.
- * Your preferences and interests (for example, preferred floor or room type)
- * Your questions/comments, during or following a stay with us.

The information collected in relation to persons under 18 years of age is limited to their name, nationality, and date of birth, which can only be supplied to us by an adult.

Information that you provide

We will process personal information that you give to WATERFRONT HOTELS (SOUTHPORT) LIMITED including when you email us or contact us through various methods as follows:

- * Signing up for services: When you book a room with us, sign up for our newsletters, webinars, events or obtain any of our services, or when you contact us with queries, or respond to our communications the personal information you provide may include your full name, title, telephone number, email address and additional content, date and time of your email correspondence.
- * When providing Ltd services: If you are a client, partner or preferred supplier of WATERFRONT HOTELS (SOUTHPORT) LIMITED you will provide us with personal information when you, or the company you represent, become a client, partner or preferred supplier with us. If you are not a client, partner or preferred supplier we may still collect or receive your personal information because you are involved in one of our client's matters.

* To enable processing of payments and fraud prevention: Financial and Payment Data including bank account and other data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information.

Other information collected about you

We will also collect information about use of our group services or when we otherwise interact or correspond with you WATERFRONT HOTELS (SOUTHPORT) LIMITED use various technologies to collect and store information when you communicate with us or visit our websites. We may, for example, collect information about the type of device you use to access the websites, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our websites, the web pages and the search terms you enter on our websites. For information about how we use Cookies and the choices you may have, please see our Cookies Policy below.

How we use the information we collect

We use your information in a number of different ways, primarily to fulfil a contract and provide excellent service to our customers — what we do depends on the information.

Contact Details:

- * To manage the reservation of beds and accommodation requests and other services.
- * To manage your stay, room lists, special requests, and services.
- * To monitor your use of hotel services.
- * To manage invoicing and payment records.

Personal Information:

- * To improve services, to input to our marketing programme, to assist promotion of our services, and adapting our products.

Information relating to your children:

- * Limited to name and age only supplied by an adult. Used to manage your stay at the hotel to ensure correct rates are applied and services are provided.

Credit Card Details:

- * To guarantee bookings and to take payment. We will hold this securely to comply in accordance to legal requirements.

Loyalty Membership Number:

- * To record us of services and supply rewards.

Arrival and Departure dates:

- * To manage your booking.

Preferences and Interests:

- * To enhance customers, stay at our hotel and to customise and improve the services we offer.

Questions / Comments:

- * To collect feedback to improve our services and monitor customer experience.

We may do the following with your personal information that we have gathered:

1. Use it to provide WATERFRONT HOTELS (SOUTHPORT) LIMITED services to a relevant client.

2. Use it to engage in marketing and business development activity in relation to our management group services. This may include sending you newsletters, legal, human resources

and health and safety updates, marketing communications and other information that we believe may be of interest to you.

3. To comply with legal and regulatory obligations that we have a duty to discharge.
4. Use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings.
5. To record and monitor your use of our websites, social media, or our other services for WATERFRONT HOTELS (SOUTHPORT) LIMITED business purposes. This may include analysis of usage, measurement of website performance and generation of marketing reports.
6. Use it for our legitimate business interests, such as for undertaking business research and analysis, managing the operation of our business, improving our websites and interfaces. We will never process your data where these interests are overridden by your own interests.
7. Use it to look into any complaints, concerns, or issues you may have.
8. Use it to prevent and respond to actual or potential fraud or illegal activities. WATERFRONT HOTELS (SOUTHPORT) LIMITED may also collate, process and share any statistics based on an accumulation of information held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

Grounds for using your personal information

We rely on the following legal basis to process your personal information:

- * Consent: WATERFRONT HOTELS (SOUTHPORT) LIMITED may in some circumstances need your consent to use your personal information. You can withdraw your consent by contacting us.
- * Obligations of a contract: WATERFRONT HOTELS (SOUTHPORT) LIMITED may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- * Legitimate interest: WATERFRONT HOTELS (SOUTHPORT) LIMITED may use your personal information for what we identify as our legitimate interests. To include all of the activities listed on page 2.
- * Compliance with the law: we may use your personal information as necessary to comply with applicable laws and regulations.

How we share information with third parties

We share personal information internally with the various entities that make up our group. We may also share your personal information outside the WATERFRONT HOTELS (SOUTHPORT) LIMITED.

This may include:

- * Third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, our IT and communications service providers, and insurance, pension or benefit providers if you are employed by us.
- * Third parties relevant to the services that we provide. This may include, but is not limited to, counterparties to transactions or litigation, other professional service providers, regulators, authorities, governmental institutions.

* To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.

Your personal information may in some circumstances be transferred to locations outside of the European Union/European Economic Area (EU/EEA) as well as within it for the purposes previously described above. We do not transfer your personal information outside the Europe as a matter of course however, where we have a requirement to transfer your personal information outside the EU/EEA, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information by for instance:

* The country to which we send the personal information may be approved by the European Commission

* The recipient may have signed a contract based on “contractual clauses” approved by the European Commission, obliging them to protect the personal information

In other circumstances, the law itself may permit us to otherwise transfer your personal information outside Europe. In all cases, however, any transfer of your personal information will be compliant with the applicable data protection law in place.

Retaining your information and how we secure it

How long WATERFRONT HOTELS (SOUTHPORT) LIMITED keeps your personal information will vary and will depend primarily on:

* The purpose for which we are using your personal information - we will need to keep the information for as long as is necessary for the relevant purpose

* Legal obligations - laws or regulation may set a minimum period for which we have to keep your personal information

WATERFRONT HOTELS (SOUTHPORT) LIMITED will retain your personal data for as long as necessary to fulfil the purposes that we collected it for and for WATERFRONT HOTELS (SOUTHPORT) LIMITED to assert or defend against legal claims. The appropriate retention period is determined by the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process and whether we can achieve those purposes through other means, and the applicable legal requirements.

Upon expiry of the applicable retention period we securely destroy your personal data in accordance with applicable laws and regulations. WATERFRONT HOTELS (SOUTHPORT) LIMITED ensures that the personal information that we hold is subject to the appropriate security measures.

Your choices and rights

You have a number of rights in relation to the personal information that WATERFRONT HOTELS (SOUTHPORT) LIMITED hold about you and you can exercise your rights by contacting us directly. These rights include:

* Obtaining or accessing your data: Regarding the processing of your personal information and access to the personal information which we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of your personal information. In particular, information that is subject to legal professional privilege will not be disclosed other than to our client and as authorised by our client.

* Correcting your data: Requesting that we correct your personal information if it is inaccurate or incomplete.

* Erasure of your data: Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information, but we are legally entitled to retain it.

* Objecting / restricting us processing: Requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request.

* Portability/Moving your data: In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.

* Withdrawing your consent: In certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

* Lodging a complaint about processing: Complaining to the relevant data protection supervising authority (e.g. The Information Commissioners Office (ICO) in the UK), if you think that any of your rights have been infringed by us.

Marketing

We would like to send you information about products and services of ours and other companies in our group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date.

Cookies

WATERFRONT HOTELS (SOUTHPORT) LIMITED We use cookies when you visit our site. There are four main types of cookies – here's how and why we use them.

* Site functionality cookies – these cookies allow you to navigate the site and use our features.

* Site analytics cookies – these cookies allow us to measure and analyse how our customers use the site, to improve both its functionality and your shopping experience.

* Customer preference cookies – when you are browsing, these cookies will remember your preferences (like your language or location), so we can make your experience as seamless as possible, and more personal to you.

* Targeting or advertising cookies – these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

By using our site, you agree to us placing these sorts of cookies on your device and accessing them when you visit the site in the future. If you want to delete any cookies that are already on your computer, the “help” section in your browser should provide instructions on how to locate the file or directory that stores cookies.

Please note that by deleting or disabling future cookies, your user experience may be affected, and you might not be able to take advantage of certain functions of our site.

How long will cookies remain on my computer?

Cookies remain in the cookies file of your browser after the closing of the browser and will become active again when the Site is reopened, until removed. The cookie(s) can be deleted at any time by you. The cookie(s) will not collect any information when you are not accessing the Site.

Third party cookies

The single session and persistent cookies are provided on our behalf by a trusted third-party service provider to aid in the reporting of user behaviour on the Sites. This behaviour is analysed to provide an improved user experience. The information collected is not linked to personally identifiable information.

WATERFRONT HOTELS (SOUTHPORT) LIMITED also use Google Analytics to help analyse use of Sites. Google Analytics generate statistical and other information about website use by means of cookies, which are stored by users' web browsers on their computer. The information generated relating to our website is used to create reports about the use of the website. Google hold this information and provide us access to it. Google's privacy policy is at <http://www.google.com/privacypolicy.html>

How to contact us and other important information

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information by Waterfront Hotels (Southport) Limited in administration. or the exercise of any of the rights listed above, please contact us. You can do this by:

* Writing to us: WATERFRONT HOTELS (SOUTHPORT) LIMITED, The White Building 1-4
Cumberland Place Southampton SO15 2NP
Company Number 06190786

* Emailing us: gdpr@michelsandtaylor.com

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