

JDP Hotels Holdings Ltd

Privacy Statement

Who we are

JDP Hotels Holdings Ltd is a private limited company which owns and manages the following businesses:

- JDP Hotels Ltd trading as **Best Western Hotel St Pierre**, 733 Barnsley Road, Newmillerdam, Wakefield, West Yorkshire WF2 6QG
- JDP Hotels 2 Ltd trading as **Beaufort Park Hotel**, Mold, Flintshire, North Wales, CH7 6RQ

This privacy statement has been prepared by the Company for the benefit of all those who use our services and describes how we collect, use, retain and disclose personal information which we hold. This privacy statement also sets out the steps we take to ensure any personal information you have provided to us is processed fairly and lawfully.

Why we have a privacy statement?

JDP Hotels Holdings Ltd recognises the importance of protecting personal and confidential information in all that we do, and we take care to meet our legal and regulatory duties including compliance with The General Data Protection Regulation (GDPR) 2016.

This statement is one of the ways in which we demonstrate our commitment to our values and by being transparent and open. This statement also explains what rights you have to control how we use your information.

What personal information do we collect?

We collect personal information at various stages during the operation of our business.

This personal information may include:

- your name, home / mailing address, email address, phone number
- information related to your reservation, stay or visit to our hotels
- participation in any loyalty program or participation in any marketing program
- payment information, such as your payment card number and other card information, as well as authentication information and other billing and account details
- your preferences for receiving marketing information and communications from us
- information about vehicles brought on to hotel premises
- your reviews and opinions about our hotels
- and other types of information that you choose to provide to us or that we may obtain about you.

2.

In addition, we collect other personal information in certain cases, such as:

- We may request demographic data or other personal information via customer surveys.
- We collect additional personal information during registration/check-in at our hotels.
- We may also use closed circuit television and other security measures at our hotels that may capture or record images of guests and visitors in public areas, as well as information related to your location while you are at our hotels.
- We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors where permitted by law.
- If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, and details of planned events. We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you as permitted by law.
- If you choose to participate in our social media activities or promotions, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.
- From time to time, we may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend, whether via the Internet, a stand-alone kiosk or mobile device. If you choose to use this feature, we will ask you for the recipient's name and email address, along with the text of any message you choose to include. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.

How we use personal information we have collected

We use your personal information in a number of ways, including to provide and personalise the services you have requested from us. We will collect your consent prior to processing your data where required by applicable law.

- We are required to collect certain data, including your name, address, payment information, and, in some circumstances, travel document information, in order to process your reservation. Failure to provide this information will result in our inability to process your reservation.
- Where permitted we may use your personal information to provide or offer you information concerning reservation confirmations, promotions, forthcoming events, conduct surveys, prize draws and any communications concerning our products and services about which you have expressed an interest. We may provide these communications via email, postal mail, online advertising, social media, telephone, text message (including SMS and MMS), and in-app messaging.

3.

- We may use your personal information to help us review and improve our products and services so that we continue to provide the level of hospitality and service you expect from us.
- Where we operate loyalty schemes such as Best Western Rewards, we will collect information provided directly by you and third parties to ensure that you are able to take full advantage of the benefits of the scheme.
- We rely on third party service providers such as on-line booking channels to organise reservations on our behalf and provide us with information necessary for us to process reservations. Our service providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law.
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What is the lawful basis for us processing personal data?

We are committed to ensuring that personal data which we collect and use is carried out in accordance with the applicable data protection laws.

We will only collect, process and share your information where we are satisfied that we have the lawful basis to do so.

This may be because:

- You have provided your consent to us using your personal information
- Our use of your information is necessary to perform our contract with you, for example processing your booking and providing services according to the terms of our agreement with you.
- We will use your information in order to meet legal obligations such as those placed on us by our regulators, tax officials and law enforcement agencies.
- We will use your information where it is in our legitimate commercial interests e.g. to use to improve our services, or to keep people informed about our product range and services. We will always look after and protect such information and ensure that your privacy rights are protected. You have the right to object to the processing of any personal information we have obtained about you.

Other information we may collect

When you visit and interact with our websites and apps, we collect other information that does not directly identify you about your use of the site, such as the site pages you visit, and the number of visits to our sites.

Because Other Information does not personally identify you, such information may be disclosed for any purpose where permitted by law. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

Sensitive information

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

Personal information from children

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

Links to third part websites and services

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

How we secure your information

Information is retained in secure electronic and paper records and access is restricted to those who need to know.

We are committed to protecting the confidentiality and security of the information that you provide to us. To achieve this, we will use technical, physical and organisational security measures to protect against unauthorised access, disclosure, damage or loss of your information. Although the collection, transfer and storage of information can never be guaranteed to be completely secure, we do take steps to ensure the necessary safeguards are in place to protect your information.

We will not pass on personal information which we hold on anyone outside of our organisation without your consent unless we are legally or contractually obliged to do so.

The Data Protection Act 1998 regulates the processing of personal information. Strict principles govern the use of information and our duty is to ensure it is kept safe and secure. JDP Hotels Ltd and JDP Hotels 2 Ltd are both registered with the Information Commissioners Office (ICO).

Managing your preferences and information

We want to make sure you have the ability to control the information you provide us, including the means by which we communicate with you. It is also important that you contact us to update your information if any of the information is inaccurate or your circumstances change.

5.

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, withdraw your consent for certain data processing activity and/or request that we update, correct, delete, and/or stop processing your personal information. We will make all required updates and changes within the time specified by applicable law and as required by law. This can be arranged via the General Manager of the relevant hotel.

The person responsible for data protection compliance for JDP Hotels Ltd and JDP Hotels 2 Ltd is Mr Tony Gentle who can be contacted at:

JDP Hotels Holdings Ltd
1A Carlyle Road
Rowley Regis
West Midlands B65 9BQ
Email: info@PrimaHC.com

Retaining your information on our systems

We generally only retain your information for as long as is reasonably required for the reasons explained in this privacy statement. We retain personal information about you for the period necessary to fulfil the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law e.g. transaction records which we keep for seven years for tax and accounting needs. We retain personal information collected in order to fulfill guest reservations for a minimum of 12 months after the stay is completed. We retain other personal information for shorter periods of time if possible and if permitted by law.

We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed.

If printed on paper, the personal information will be destroyed in a secure manner, such as by cross-shredding or incinerating the paper documents or otherwise and, if saved in electronic form, the personal information will be destroyed by technical means to ensure the information may not be restored or reconstructed at a later time.

Cookies and other tracking technologies

We use cookies and other tracking technologies on our websites to improve our products and services and also our marketing.

This site uses Google Analytics for website analytics and you can find information about their privacy policy here: <https://support.google.com/analytics/answer/6004245?hl=en>

Your data may also be sent through Cloudflare, our Domain Name System (DNS) provider and BestWebHosting, our Virtual Private Server (VPS) host however we do not control these systems and we do not send any personal data directly to them.

SSL is used on our sites to provide a secure channel for devices operating over the internet.

6.

Articles on our site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that website's content. This may include tracking your interaction with the embedded content if you have an account and are logged in to that website.

A contact form is used on our sites to obtain contact information users. The data you enter is emailed to us where it is kept for administrative purposes. Your data will never be sold to third parties for marketing purposes unless there is a legal obligation to.

Further information concerning cookies may be found via our website.

Changes to this privacy statement

We may have to change or modify this Statement from time to time. When we make material changes to this Statement we will post a link to the revised Statement on the homepage of our website, and if you have registered for any of your products or services, will may also inform you using your preferred method of communication that you have provided. You can tell when this Statement was last updated by looking at the link and at the date at the top of the Statement. Any changes to our Statement will become effective upon posting of the revised Statement on the site.