

Wickman Hotels Limited, T/A the Cuillin Hills Hotel

# Policy on the General Data Protection Regulation (GDPR) (EU) 2016/679

## A Guide for Guests on Data Protection

As a company Wickman Hotels Limited value your custom and do everything possible to make your experience as pleasant and enjoyable as humanly possible. To ensure you experience the optimum from the facilities we offer, we require to undergo the process of gathering information about you and your party. We shall refer to this information as data. It is important that you understand the data that we gather, why we gather it, how we use it and how we store it. It is also important that you know and understand your rights regarding its storage and use. The purpose of this policy information sheet is to help you understand the process. Any reference to 'we' or the hotel means The Cuillin Hills Hotel. The term booking means the cost of any accommodation and any subsequent goods or services that are ordered by you during, prior to or associated with your stay.

1. The hotel shall appoint a staff member with specific responsibility for data protection. The staff member will have a sufficiently senior position in order to fulfil their duties and the hotel's obligations under this regulation.
2. The hotel may store electronically and or manually the following data.
  - a. Your name, address, age and or DOB,
  - b. Your telephone number and Email address.
  - c. Your car registration number, passport number and details of any document or card that has been provided as a form of identification.
  - d. Your bank card details, bank details and account numbers.
  - e. CCTV images are recorded in selected parts of the hotel and you may be recorded as part of a process as opposed to specifically. CCTV operates for the purposes of public safety and the prevention and detection of crime. It will not be used for any other purpose and will be destroyed when no longer required. Recordings may be made available to the police or other law enforcement agency who request or require them for these purposes.
3. Any data stored will not be shared with any person or any party outwith the hotel, except in so far as to administer any booking(s) made and to ensure that payment for goods or services is transacted, unless the hotel is under a legal obligation to provide these details to another party. An example of data sharing with a third party would be with say a booking agent, who was used to book the hotel, or our bankers for the purpose of transacting a booking payment.
4. Any data held by the hotel shall only be made available to staff who require it.
5. Any data stored shall be kept secure so as to avoid accidental release to third parties and will be destroyed as soon as this data is no longer required by the hotel unless there is a legal requirement to retain it. Any paper records shall be destroyed by means of a shredder.

6. We may ask that your data be used for other purposes such as marketing or statistical analysis. In doing so this will be an 'opt in' as opposed to an 'opt out'. All consents asked for or given will be specific to that individual topic and consents will not be bundled together.
7. No supply of goods or services will be conditional. Only data for the purposes at 2. (a-d) above, will be a requirement for your booking. In other words the supply of goods or services will not be conditional to you agreeing to say marketing.
8. You have the right to be informed of what data we have relating to you and the right of access if you request it. The hotel will not charge for this information and will deliver it to you within one month of your request. It will be delivered in a format which is readily useable. If however, we feel that the information requested is complex or will be excessively time consuming the hotel may charge a fee commensurate with the time expended on the gathering of the information. In this case we may extend our period of response to two months. You will be advised of progress if we cannot meet any of the deadlines given.
9. Should any data that the hotel hold be inaccurate or incorrect, you have the right to seek the deletion or removal of it in certain circumstances. An example of this would be if you withdraw consent to your details being used or that the hotel no longer require your details for processing, although this should not be interpreted as an absolute right to be forgotten. You also have the right to restrict the processing of data where you contest the accuracy of the data being processed.

Should you have any questions or require further information on any of the above points, please speak to the receptionist on duty who will endeavour to assist in any way they can.

Thank you for choosing The Cuillin Hills Hotel and we hope that you enjoy your stay.