



The Wood Norton Hotel
Privacy Policy
Updated 24.05.18

1. INTRODUCTION

At The Wood Norton we use certain elements of your personal data to provide our hospitality services to you. In this Privacy Policy, we have described how we collect store and use your personal data. Every care is taken by The Wood Norton to protect your personal data and your privacy during this process in accordance with all relevant legislation. The Wood Norton has steps to control what we do with your personal data and these are detailed throughout our Privacy Policy.

By the term 'personal data', we mean data which could be used to identify you, including your name and contact details, and any related data which could be attributed to you. It may also include information about how you use our website and other services.

Wrigop Limited's privacy policy does not include information about the privacy of The Wood Norton employees' data, which can be obtained from our HR department.

2. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA

Wrigop Limited c/o The Wood Norton is responsible for your personal data. Our registered address is The Wood Norton, Worcester Road, Evesham, Worcestershire, WR11 4YB. We are registered as a company in England and Wales under company number: 07810626.

We are the data controller and data processor of your personal data which we collect from you. We are responsible for the ways your personal data are collected and the purposes for which your personal data are used.

3. HOW WE PROTECT YOUR DATA

The Wood Norton uses technical measures such as encryption and password protection to protect your data and the systems they are held within. Operational measures are taken to protect data, for example by limiting the number of people who have access to your personal data to parties who have a business need to know. We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Security measures are kept under review and refer to industry standards to keep up to date with current and best practices

Our data processing is undertaken in the European Economic Area (EEA). We will ensure that any data that is processed outside of the EEA adheres to the same security standards as that processed inside the EEA.

4. WHAT PERSONAL DATA WE COLLECT FROM YOU

The Wood Norton privacy policy applies to all personal information collected, by whatever means, both about its customers and about its contacts. The first section below applies to customers and explains what personal information we collect about customers, how we collect it, what we use it for and the legal basis on which we rely to do so. The second section below provides all the same information for our contacts.

CUSTOMERS

PERSONAL INFORMATION WE COLLECT FROM CUSTOMERS

- Name, email address, home and/or business address, phone number
- Payment card information
- Booking history
- Transactional data including details about payments to and from you and other details of products and services you have purchased from us
- Information relating to your use of our services, such as room preferences, special requests, feedback, survey responses and marketing response

HOW IS OUR CUSTOMER'S PERSONAL DATA COLLECTED

- Data is collected from our customers when it is provided via Telephone, Email, Post, through our Direct Website, Third Party Booking Portals or in Person. We use CCTV in and around our hotel which will gather information about your activity within our hotel.

LEGAL BASIS FOR PROCESSING OUR CUSTOMERS INFORMATION

- Your personal data is only used as per the law permits. By law we are required to tell you the legal bases upon which we rely in processing personal information. The legal bases we principally rely upon are:
 - It is necessary for the performance of a contract between The Wood Norton for the provision of services or in order to take steps at your request prior to entering into such a contract; and/or
 - It is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.
- Occasionally we may also rely upon the following legal bases for processing:
 - You have given the consent to the processing; and/or
 - It is necessary for us to comply with a legal obligation on us; and/or
 - It is necessary to protect your vital interests or those of another individual.

Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us by emailing sales@thewoodnorton.com

WHAT DO WE USE OUR CUSTOMERS PERSONAL INFORMATION FOR

- To fulfil your reservations and/or provide services or facilities for your experience
- To fulfil your bookings and/or to provide services or facilities you request from us
- To process credit card facilities/payments/refunds from you if required
- To respond to any enquiries and requests made
- To administer and manage our relationship with you, which may include asking you to complete survey's or feedback forms
- Where you have made a reservation or function booking with us, to provide you with further information before your visit to confirm the reservation/booking and provide you with other information relating to your reservation/booking which we think you may find of interest
- To send you marketing and promotion material where we think this may be of interest to you (unless you have objected to receiving this by contacting by emailing sales@thewoodnorton.com)
- Where required by law / To meet certain legal responsibilities
- Where necessary to protect your health or wellbeing or that of another individual

CONTACTS

PERSONAL INFORMATION WE COLLECT FROM CONTACTS

- Name, email address, home and/or business address, phone number
- Marketing preferences

HOW IS OUR CONTACTS' PERSONAL DATA COLLECTED

- Data is collected from you when you provide it to us by phone, email, post, through our website and booking portals or in person /

- Data is collected from our customers when it is provided via Telephone, Email, Post, through our Direct Website, Third Party Booking Portals or in Person. We use CCTV in and around our hotel which will gather information about your activity within our hotel.

LEGAL BASIS FOR PROCESSING OUR CONTACTS INFORMATION

- Your personal data is only used as per the law permits. By law we are required to tell you the legal bases upon which we rely in processing personal information. The legal bases we principally rely upon are:
 - You have given consent to the processing; and/or
 - It is necessary for the purposes of our legitimate interests or pursuing and developing our business, where interests are not overridden by your rights of interests.
- Occasionally we may also rely upon the following legal bases for processing:
 - It is necessary for us to comply with a legal obligation on us; and/or
 - It is necessary to protect your vital interests or those of another individual.

Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us by emailing sales@thewoodnorton.com

WHAT DO WE USE OUR CONTACTS PERSONAL INFORMATION FOR

- To fulfil your requests for information
- To send you marketing and promotional material where we think this may be of interest to you (unless you have objected to receiving this by contacting us by emailing sales@thewoodnorton.com)
- Where it is necessary by law; and
- Where necessary to protect your health or wellbeing or that of another individual

5. MARKETING

You may receive marketing communications from us. These communications will only be sent if you have specifically requested that information from us or by email, text or post, if you have not opted out of receiving that marketing communication (which you may do so by emailing sales@thewoodnorton.com). Otherwise, we will not send you any marketing communications unless we have your explicit consent

Please note you can ask us to stop sending your 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 using the email sales@thewoodnorton.com

6. FAILER TO PROVIDE PERSONAL INFORMATION IF REQUESTED

Where a need is required by The Wood Norton 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, The Wood Norton may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with services). In this case we may have to cancel a service you have booked with us but we will notify you if this is the case at the time

7. HOW WE WORK WITH THIRD PARTIES / SHARING OF YOUR PERSONAL DATA

We use a number of Third Party systems to collect and process your personal data for the purposes detailed above. This includes our own website (which is developed and hosted by a Third Party), our reservations systems, some marketing systems (such as email systems) and our payment system providers. We ask that they follow the same rigorous data protection standards that we do.

We collect personal data from Third Party agents who process reservations or other information on our behalf. Examples of these include online travel agents and our WiFi provider.

We will not disclose personal information we hold about you to any Third Party except where required by law or as follows:

- To Third Parties who provide services to us, and act as data processors for us;
- To professional advisors including lawyers, bankers, auditors and insurers
- To HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances

Please note we do not allow our Third Party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

We will never sell, rent, loan or share your personal data with a Third Party for the purpose of marketing activity of any nature, unless you have provided us with explicit permission to do so

8. HOW LONG DO WE KEEP DATA FOR

The Wood Norton will only keep and retain data for as long as we need it. How long we need data for can depend on what we are using the data for as described above.

To determine the appropriate retention period we actively review data we hold and where there is no longer a need for us to hold it, we will either delete it securely or in some cases anonymise it.

We aim to destroy any paper copies of your personal data as soon as they have served their purposes. In the cases where we need to keep paper copies for longer, we ensure that they are stored securely and access is limited

9. YOUR RIGHTS

You have a number of rights to your personal data, which include

- The right to access your data
- The right to correct your data. This enables you to have any incomplete or inaccurate data we hold about you corrected though we may need to verify the accuracy of the new data you provide us
- The right to delete your data or restrict their use. Please note, however, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- The right to be object to the certain uses/request restriction and/or processing of your personal data
- To request transfer of your personal data to you or to a Third Party. Please note this right only applies to automated information which you initially provided consent for us to use where we used the information to perform a contract with you

If you wish to exercise any of these rights we may need to request specific information from you to help us confirm your identity. 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 help speed up our response.

We will deal with data access requests promptly and in any event within a month of receiving it or (if later) from the day any information requested to confirm the requester's identity is obtained.

We want to give you as many choices as possible regarding the use of your personal data for marketing, advertising or promotional purposes. You can Opt-Out of receiving future marketing communications at any time and can do so by clicking the unsubscribe link in any email that we have sent you, or alternatively you can email sales@thewoodnorton.com to ask to be removed from our mailing lists.

Please note that if you tell us that you do not wish to receive marketing communications, you will still receive service emails which are directly related to your reservation or subscriptions, for example a booking confirmation or contract.

10. How to contact us

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:-

By Post

FAO: GDPR Marketing Department, The Wood Norton Hotel, Worcester Road, Evesham, Worcestershire, WR11 4YB

By Email

sales@thewoodnorton.com

If you have any complaints or queries you can raise these with us or if you believe we are not processing your personal data in accordance with the Data Protection Laws you have the right to lodge a complaint at the Information Commissioner's Office (ICO), whose details can be found on www.ico.org.uk