

Hotels 109 Ltd Privacy Policy

This Privacy Statement applies to the processing by Hotels 109 Ltd Company of your (our guests) personal data. Hotels 109 Ltd Company takes your privacy very seriously and treats all your personal data with great care. Hotels 109 Ltd Company acts in accordance with the applicable data protection legislation.

When you visit our websites (or subdomains) (the "Website"), make a reservation, contact us, purchase products from us or visit one of our properties, we collect information from and about you. Some of the information we collect may be classed as personal data under data protection legislation, that is, "any information relating to an identified or identifiable natural person". It may be collected any time you submit it to us, whatever the reason may be.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by Hotels 109 Ltd Company. It also states which rights you have under applicable data protection legislation.

Hotels 109 Ltd Trading as The Bedford Arms Hotel collects information about you in the following ways.

Information you give to us. This includes personal data collected:

Through our Website when you register, login, commence or complete an online transaction to use our products and services.

When you contact our reservations team to make a booking.

When you have provided your consent, in order to:

Sign up to any of our loyalty programmes;

Subscribe to any of our marketing communications

Complete customer surveys, enter competitions or provide feedback.

When we do business with you, which will usually include:

Full or partial contact details including names and addresses (including business details if you are making a corporate booking), telephone and email details.

If you have special requirements then it may also be necessary to collect details about diet or disability or any other preferences that you may have.

Car parking arrangements at our properties may also make it necessary for us to collect your car registration number for your visit to us.

We collect payment card information from you should you choose to use this form of payment for purchasing or guaranteeing use of our products and services.

We may also collect your birthdate and other significant dates for making special offers to you around your birthday and other anniversaries.

From our overseas guests we may also collect passport details.

Information Automatically Collected. This includes information and personal data collected:

Through our Website. We automatically log information about you and your computer or mobile device when you access Website. The information about your use of the Website comprises http header information which your browser transmits to our webserver, information collected through the use of cookies and log information. For example, when visiting Website, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Website, pages you viewed, how long you spent on a page, access times and information about your use of and actions on Website.

Through CCTV at our properties. We operate CCTV systems at our properties. These are in operation and video recordings may be made. This activity is carried out for security and service reasons for the better management of Hotels 109 Ltd Company's properties and security for all its clients and staff.

Regardless of which Hotels 109 Ltd Company property that you visit, your personal data will be stored in (i) centralized systems which are under the control of Hotels 109 Ltd Company and accessible by authorized staff of Hotels 109 Ltd Company or our suppliers, and (ii) some local systems controlled solely by the relevant Hotels 109 Ltd Company property(s).

We use the information we collect about you to process your bookings, answer your queries, process your gift card purchases, provide our hotel and restaurant facilities and services, enable you to manage your website user account and provide loyalty programmes. With your consent, we will contact you via our marketing and sales channels (email/ phone/ post) about other related products and services we, or our group business, provide which we think may be of interest to you. Our marketing communications are generally sent by email but we may sometimes use other methods of delivery such as by post or SMS.

We mainly collect, store and process personal data at two different stages: (i) before you decide to visit one of our properties and (ii) when you visit, or have visited, one of our properties.

Before you decide to visit one of our properties

When you visit our Website (www.bedfordarms.co.uk), we collect information about your use of the Website. This includes both information we collect directly from you, and information we collect about your behaviour. This information may constitute 'personal data' under applicable law. We use this information to provide you with (personal) offers, both on our Website and via advertisements on other websites you visit.

When you visit or have visited one of our properties

When you make a reservation, you will have to provide us with your name, email address, phone number, the dates you are staying with us and a credit card token or other payment information as applicable. We use this personal data to process the reservation, for billing purposes, and to allow us to communicate with you about your reservation. When you stay in one of our properties, we will collect personal data about your preferences, use of our services, and location.

We may share your personal data as follows:

Third Parties Designated by You. We may share your personal data with third parties where you have provided your consent to do so.

Our Third Party Service Providers. We may share your personal data with our third party service providers who provide services such as payment processing, information technology and related infrastructure provision, business support (operational and administrative), customer service, the processing and delivery of marketing communications to you, email delivery, auditing and other similar services. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data. Third parties are subject to confidentiality obligations and may only use your personal data to perform the necessary functions and not for other purposes.

Affiliates. We may share some or all of your personal data with our affiliates, in which case we will require our affiliates to comply with this Privacy Statement. In particular, you may let us share personal data with our affiliates where you wish to receive marketing communications from them.

Corporate Restructuring. We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

Other Disclosures. We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any business external to our group for their own marketing purposes. From the data we collect, you should only ever receive marketing communications from our own brands and hotels.

The GDPR provides the following rights for individuals:

Right to revoke consent

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

Right of access to your information

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by sending an email

to info@bedfordarms.co.uk. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

Right to rectification and erasure of data, and restriction of processing

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by sending an email to info@bedfordarms.co.uk.

Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

Right to object

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. Furthermore, you have the right to object at any time to our processing of your personal data for direct marketing purposes or to profiling. You can do this by either (i) opting out by using the option we provide in the relevant direct marketing message (e.g. an email newsletter), or (ii), or (iii) by sending an email to info@bedfordarms.com.uk, or (iv) writing to:

Customer Service Team

The Bedford Arms

Latimer Rd

Chenies

WD36EQ

For the sake of clarity: without prejudice to the foregoing we are at all times entitled to send you messages that do not constitute direct marketing, i.e. service messages.

General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law.

We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may either (i) charge you a fee, or (ii) refuse to process your request. With respect to access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

We have used and will continue to use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be encrypted and stored on a virtual private server that is secured by means of state of the art protection measures. A strictly limited amount of people have access to your personal data.

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.

The Website uses various cookies. We may track and record your use of our online services, either through cookies or via other means. Cookies enable us and others to monitor your browsing behaviour. Information generated by the use of cookies may constitute personal data. We may use the personal data collected in this manner for the purposes as stipulated in this Privacy Statement. If you want to know more about our use of cookies, read our [Cookie policy](#).

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement. This may be up to 4 years, unless a longer retention period is required or permitted by law (which is typically the case in the context of our obligations under tax law).

Should you choose to unsubscribe from our mailing list, please note that your personal data may still be retained on our database to the extent permitted by law.