

## **Interstate Guest Privacy Notice**

*Last updated: May 2018*

Interstate Europe Hotels and Resorts ("**Interstate**", "**we**" or "**us**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about guests staying at our hotels ("**guest**", "**you**"), and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

### **What does Interstate do?**

Interstate offers a complete suite of hotel management services with a team of hospitality professionals, providing hotel owners and developers with personalised attention and a focus on top line revenues and bottom line profits, every single day, at each and every hotel we operate. Our world-class management platform offers industry leading systems and solutions, experienced professionals, depth of resources, and valuable relationships with major global hotel brands.

For more information about Interstate, please see the "About Us" section of our website at <http://www.interstatehotels.co.uk/about-us>.

### **What personal information does Interstate collect and why?**

The personal information that we may collect about you broadly falls into the following categories:

- *Information that you provide voluntarily*

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include your contact details in order to make a reservation, book or purchase one of our services, subscribe to marketing communications from us, and to submit enquiries to us.

We will also ask you to provide your credit card details so that we can charge you for any purchases that you make during your stay at the hotel. We will also collect your hotel loyalty card number so that we can communicate with the hotel to ensure that you collect points for your stay at the hotel.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

- *Information that we collect automatically*

We may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

- *Information that we obtain from third party sources*

From time to time, we may receive personal information about you from third party sources (including travel agents that have made a booking on your behalf), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include your name, address, email, credit card rewards number and stay history. We use the information we receive from these third parties to honour your reservation.

### **Who does Interstate share my personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information;
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

### **Legal basis for processing personal information (EEA visitors only)**

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

### **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

### **How does Interstate keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

### **International data transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our servers are located around the world, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice.

## Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take

appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

**How to contact us**

If you have any questions or concerns about our use of your personal information, please contact us using the following details: [privacy@interstatehotels.com](mailto:privacy@interstatehotels.com)