

# Privacy Policy

Last modified 26/5/18

Your privacy is very important to us. We know that's the kind of thing all these sorts of notices say, but frankly we mean it. You've placed your trust in us by using the Harrogate Lifestyle Apartments (HLA) and we value that trust. We are committed to protecting and safeguarding any personal data you give us.

This document describes how we use and process your personal data, hopefully provided in a clear and transparent manner so you can get where we're coming from without getting too bored.

You may or may not know that Harrogate Lifestyle Apartments offer serviced apartments which can be booked through our own website and online travel agents (such as Booking.com). Other online agents will have their own privacy policies, but everything to follow applies to us and covers all kinds of information we collect.

We really hope that the information provided in this policy gives you all the confidence you need to book your next stay with us. However if you are not totally satisfied then please do contact us so that we can totally reassure you or if not just discontinue using our services.

## **What kind of personal information (data) do we collect?**

So that we can provide you with the perfect accommodation together with an excellent service there are certain kinds of information we need. Nothing too complicated – name, address, email address, mobile number, your IP address if booking on our website, and payment details.

## **How do we collect your personal data?**

There are basically 5 ways we can collect your details.

- 1) When you place a booking via our website you will complete the booking process by entering your details onto the website. These are then automatically loaded onto our booking system.
- 2) Some people prefer to call our office and place a booking over the phone. You will be asked at the time if you consent to HLA using your data to process the booking and contact you by phone, email or via email marketing.
- 3) If you place a booking via an online agent, then they will pass your details via their system to our system. We will then use these details to process the booking.
- 4) You may choose to subscribe to our email newsletter. You will be asked at the time if you consent to us using your personal details by ticking a box.
- 5) If you send us an email enquiry then we may use your data to contact you by phone or email subject to your preference. By sending us an email enquiry with a request for a response, you consent to us using you details for this purpose.

### **Why do HLA collect and use your personal data?**

The main reason we ask you for personal details is to administer your bookings, ensure you get the best service possible and keep your information safe. We also use your personal data to contact you and to inform you of our latest deals and special offers. There are other uses too – if you'd like to find out what they are, read on for a more detailed explanation.

We require your **name** to clearly understand who we are communicating with. We certainly don't want any confusion.

To communicate, we prefer to send booking details by **email** so that you have a copy to refer to at all times. We also send out the arrival instructions by email. These are required to access the building and your apartment. So you can see why this is important.

We may also send out an **email** after your stay just politely asking if you would kindly review your experience on certain review websites.

We ask for your **mobile number** because shortly before your arrival we send out a text which includes the codes to access the building and apartment. This is just a back-up to the arrival email but guests find this very useful especially if you accidentally misplace your paper copy. We want to ensure you gain access to your apartment in good time and in a relaxed manner.

We may also need to call you to discuss something specific about your booking. This could be in response to a question you asked or something we feel may help improve the experience of your stay – but don't worry no calls pressurising you to purchase anything!

Your **credit card details** are stored on our system but encrypted and password protected for your security.

The **address** where the card is registered is also stored on our system as this may be used during the payment process.

In certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, or to enforce the terms of use of the HLA online booking system as reasonably expected.

**To process your information as described above, we rely on the following legal bases:**

Consent: We may rely on your consent to use your personal information for certain direct marketing purposes. You may withdraw your consent at any time by contacting us or unsubscribing on the email itself.

Performance of a contract: In order the process the contract it may be necessary to use your information. This would apply when making a booking online.

We may use your information for our legitimate interests, such as to provide you with the most suitable content of the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.

### **Where do we store your data?**

We observe reasonable procedures to prevent unauthorized access to, and the misuse of, personal data.

We also have security procedures which include both technical and physical restrictions for accessing your data held on our systems. There are no unauthorised persons allowed to access personal data.

So just a bit more detail to help explain. Our systems are password protected and payment details are encrypted.

### **How does HLA share your data with third parties?**

We know this is very important to everyone and also crucial when processing the booking you have made. So we only share your data with payment providers and financial institutions who are specifically required in order for us to process the payment for your booking. This may also include your IP address.

We may disclose personal data to law enforcement. This would not extend further than what is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud.

We may use your email address which we give to our service provider for sending our email marketing. The service provider is fully compliant with data protection.

This website is hosted by Spoton.net Limited. The Spoton.net Limited privacy policy, which can be viewed at <http://itseeze.co.uk/privacy-policy/> applies to this site.

We certainly DO NOT pass your details to any third party whom may then use this information to market products or services to you.

### **How does HLA treat personal data of children?**

We only allow adults over 18 years of age to book with us. We would only process information about children with the consent of the parents or legal guardians.

### **How can you control the personal data you have given to HLA?**

You always have the right to review the personal information we keep about you. You can request to see this information at any time by email a request.

If you believe that the data we hold for you is incorrect or you do not wish us to hold this any longer then please let us know by email.

## **Cookies.**

### **What is a cookie?**

A cookie is a small amount of data that is placed in the browser of your computer or on your mobile device. Cookies are used for different purposes. Ours allow you to be recognized as the same user across the pages of a website.

When you first visit our website a cookie policy popup will appear. It's an implied consent notification – so if you click through to another page on your website or leave and then return then we take that as consent has been gained.

When the notice first appears there is a link you can click to read the cookie policy.

## **Closed Circuit Television (CCTV)**

We operate 24/7 recorded CCTV at the entrance to the Harrogate Lifestyle Apartments and in the communal areas within the building. There is no audio recording i.e. conversations are not recorded on CCTV.

### **Why have we fitted these cameras?**

We have fitted these cameras for the protection of everyone staying in the building. We want you to feel safe and secure. Whilst we do have a secure entrance we want to go that next step in trying to deter crime. Should anyone not staying in the building gain access illegally then we have recorded evidence of this activity which may be used in a court of law.

### **Where are these cameras fitted?**

The cameras are fitted at the entrance, reception area and in all the corridors and stairs. The cameras are all clearly visible.

No cameras face directly into an apartment.

### **How do we let you know we have these cameras and that we are recording your data?**

When we send out the arrival instructions by email, there is information provided that explains we have 24hr recorded CCTV.

There are numerous signs at the entrance to the building and also in the reception area and key collection point.

### **Where do we store this information.**

The recording equipment is kept on site in a secure location. Access to the CCTV recording equipment is restricted and password protected.

### **Recording and retention of images.**

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs/dongles are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However,

where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

### **Individuals' access rights**

Individuals have the right on request to receive a copy of CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to Harrogate Lifestyle Apartments. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images. The Company will respond promptly and in any case within 20 calendar days of receiving the request.

We will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images



of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Changes to this privacy policy**

We may occasionally make changes to this privacy policy. Following any changes, the date at the top of the privacy policy will be updated. If any change allows for the wider access to or sharing of data, such changes will only apply to data collected after the date of the updated privacy policy.

### **What's Next.**

If you are happy with all the information provided regarding personal data and how we manage this, then you are *good to go!* We look forward to receiving your next booking.

If you have any questions in relation to our use of your details, or wish to have your details updated or removed from our system then please email us at:

[info@harrogatelifestyleapartments.com](mailto:info@harrogatelifestyleapartments.com) or write to us at Harrogate Lifestyle Apartments, 18 Spa Building, Kings Road, Harrogate North Yorkshire HG1 1BT United Kingdom.