



BARTON HALL LTD PRIVACY STATEMENT

This website is operated by Barton Hall Ltd located at Barton Road, Kettering Northamptonshire, NN15 6RS Company number 7842885. This Privacy Statement and any correspondence is between Barton Hall Ltd, and “you” the user of the Website and our services and facilities. “You” shall mean you and any third party that accesses the Website; someone who is not employed by us, is an individual or acting in the course of employment; that is 18 years old or older and capable of entering a contract.

We are committed to ensuring that your privacy is protected and understand the need for appropriate protection of all personal information provided by you to us.

By providing us with your personal information “Data” (as defined below), whether through the Website or in person, you consent, agree and accept that we, as well as our respective representatives and/or third-party agents may collect, use, disclose and share among ourselves your personal Data as described in this Privacy Statement.

Please read this Privacy Statement carefully to understand our views and practices regarding your personal Data and how we will treat it, by visiting and continuing to use the Website or using our services you are consenting to practices described in this Privacy Statement.

WHAT DATA DO WE COLLECT ABOUT YOU?

We collect data from you when you make a booking, use our facilities or our services, via our team, either in person or over the phone, and when you book online via our Website.

We also collect data when you fill in our registration forms, feedback forms or by connecting using our social media websites.

Facilities include but are not limited to the following; Barton Hall Hotel, including the Vines Brasserie restaurant.

We have CCTV installed in our premises in public areas and particularly around entrances and exits; this is for the purposes of prevention and detection of crime and employee monitoring and is held for no longer than 31 days at any one time.

We also collect Data from you when you subscribe to any of our marketing communications, complete our voluntary customer feedback surveys, enter our competitions or provide feedback. These may be carried out online, by telephone or in person.

Some of the Data we collect may be classed as personal Data, that is, it is information about an individual who can be identified from it. It may be collected any time you submit it to us, whatever the reason may be.

Without limitation, any of the following “Data”; (meaning collectively all information that you submit to the Website, including but limited to, personal details and information submitted using any of our services, as provided on the Website), may be collected by us via our Website including:

- Your full name;
- Your contact information such as email addresses and telephone/mobile numbers;
- Your demographic information such as preferences and interests;
- Your geographic information such as home address and post code (where applicable);
- Your date of birth

- Your IP address (automatically collected);
- Your web browser type and version (automatically collected);
- Your operating system (automatically collected);
- Your credit or debit card details where you make a payment
- A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected); and
- Your Cookie information (see below).

In addition, the following Data will be collected when you fill in our guest form and may include,

- Your full name,
- The name of your partner or spouse;
- The name of your children;
- Your date of birth;
- Your contact information such as email addresses and telephone/mobile numbers;
- Your demographic information such as preferences and interests;
- Your geographic information such as home address and post code (where applicable)
- Your special dietary requirements;
- Your credit or debit card details where you make a payment;
- Your medical history;
- Your physical health history;
- Your car registration for car parking arrangements and events; and
- Your passport or driving licence details

We store credit and debit card detail when bookings are taken online for both pre-authorisation and payment, these are facilitated via a third party called Opera PMS via their system Oracle. Their privacy policy can be found here <https://www.oracle.com/search/results?Nty=1&Ntk=S3&Ntt=data+privacy>. If you do not agree with their privacy policy then do not purchase our services.

If you choose to connect with us via social media websites, for example such as Facebook, Instagram or Twitter, we may collect your user name, (which may contain your name and surname) by you “liking” or “following” our page.

We may also run competitions via these social media websites which will send you to a separate competition website link. By connecting with us via social media websites you are bound by their terms and conditions and privacy policies.

If you provide us with any personal Data relating to any third party (e.g. information about your spouse, children, employees or colleagues) for a particular purpose, by submitting such information to us, you warrant and represent to us that you have obtained the consent of such third party to provide us with their personal Data for the respective purposes.

HOW WILL WE USE THE DATA ABOUT YOU?

We use the information we collect about you to;

- to provide and improve our services to you,
- process your bookings and accommodation;
- personalise your experience;
- answer your queries;
- process your voucher purchases;
- provide our food and beverage facilities and services; and
- provide our services,
- for other legitimate business purposes.

With your consent, we will contact you via our marketing and sales channels (via email, phone or post) about other related products and services we 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. At any time you may stop these communications by unsubscribing. This can either be done by following the unsubscribe link in our marketing e-mails or by e-mailing enquiries@bartonhall.com

We may use your Data collected from the Website, via cookies or direct input, to personalise your repeat visits to our Website.

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience. Specifically, Data may be used by us for the following reasons:

- internal record keeping;
- improvement of our offers, products and Website;
- linking you with third party payment collecting company for payments;
- contact for market research purposes which may be done using email, telephone or post.;
- transmission by email of promotional materials that may be of interest to you;
- to pass on to the police and government authorities as requested by them, for example in cases of fraud and theft, and
- to comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on us.

We sometimes engage the services of trusted third parties to process the Data collected by generating anonymised statistics to assist us with our marketing campaigns and business analysis. We do not disclose this anonymised Data outside of our business group. It is not possible for the business to identify an individual from such anonymised Data presented in our internal reports.

We adhere to the following working principles:

- access to Data from our third-party clients' is restricted to our relevant employees.
- any to Data disclosed to third party clients' is anonymous and you cannot be identified by it, save for payment details where we use a third-party payment collecting company.
- We have measures in place to keep the personal Data we hold safe and secure.
- All our relevant employees have received training in how to handle Data. This includes ensuring they are aware of the importance of handling Data safely and securely and understanding the procedures in place to ensure this happens.
- When collecting Data for third party clients all Data is anonymised, save for payment details where we use a third-party payment collecting company Barclaycard and American Express.
- Once every year we will evaluate our database and securely delete any contacts no longer engaged or any Data no longer needed by us.
- All personal information is stored in Barton Hall Ltd secure web server hosted site to which access is only granted to key personnel. Where data is downloaded to be updated, and as a backup to the cloud, it is only stored on personal drives, only accessible via an individual log in.
- The Data Processor and the Data Controller can be contacted via email on Enquiries@bartonhall.com, please put the topic of your enquiry in the header title.
- The Data Controller acknowledges possible recipients of your Data include; our employees, agents, consultants, third parties and data processors.

DATA SHARING

We share your Data within Barton Hall Ltd and its subsidiaries.

Where we use contracted and trusted third parties to facilitate our provision of services and offers, we will also share your Data with those parties for that purpose. This includes the processing and delivery of marketing communications to you, processing review and upgrade services and any other third-party services engaged to perform payment, business support, operational or administrative function.

All Data is processed within the UK.

Third parties are subject to confidentiality obligations and may only use your personal Data to perform the necessary functions as requested by us and not for any other purposes.

Save as listed in this Privacy Policy, 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 Barton Hall Ltd.

From the Data we collect, you should only ever receive marketing communications from our own brand.

We may also disclose personal Data as permitted or required by law. For instance, if asked by the police or HMRC, we may share your personal Data with them for the purposes of prevention and detection of crime.

TRANSACTION AND DATA SECURITY

Whilst we take reasonable, appropriate technical and organisational measures to safeguard the personal Data that you provide to us, no transmission over the internet can ever be totally guaranteed secure.

Consequently, please be aware that we cannot guarantee the complete security of any personal Data that you transfer over the internet to us whilst in transit. Sending such information is entirely at your own risk.

We understand how important it is to securely store any Data that you provide. We take the privacy and security of your payment and personal details very seriously. Although we take reasonable care to keep your personal Data secure, we cannot be held liable for any loss you may suffer from unauthorised access or loss of any Data provided.

You can tell whether a page is secure as 'https' will replace the 'http' at the front of the in your browser address window. A small locked padlock will also appear either in the bottom bar of your browser window or alongside the browser address, depending upon which browser software and version you are using.

Where you make a payment in person at our reception we use the secure third-party payment called Barclaycard. Please see their privacy policy here. <https://www.barclaycard.co.uk/personal/privacy-policy>

On pre-paid bookings, payment is taken up-front and money taken at the time of booking. It is important that you take note of our cancellation policy in our Terms and Conditions we reserve the right to charge and take payment from your card for a "no-show" should you fail to turn up for your stay and have not let us know by the agreed time period in advance of arrival.

Where asked, you are required to be able to produce the same card, used for any booking paid in advance online, at check-in.

In addition to the Data collected via our Website when we collect Data in person we keep this information in secure files with restricted access to keys.

MARKETING

We would like to send you information about Barton Hall Ltd products, offers and services, which we believe may be of interest to you. If you have consented to receive our marketing, you may opt out at any time.

If you no longer wish to be contacted, you can unsubscribe by any of the following methods:

- Select the UNSUBSCRIBE link included in our emails or on our Website;
- Contact our Data Processor on the email address: enquiries@bartonhall.com and the subject matter in the email header.

ACCESSING AND AMENDING YOUR DATA

You have a right to access a copy of the Data which we hold about you. If you would like to do this, please email us at Enquiries@bartonhall.com and the subject matter in the email header or write to us at the address above.

We want to make sure that your personal Data is accurate and up to date and therefore you may need to modify or update your Data if your circumstances change.

Additional Data as to your marketing preferences may also be stored and you may change this at any time, to do this please email us at enquiries@bartonhall.com.

You are able to make amendments, or withdraw your consent for use, by telling our reception staff when you check in or by contacting our Data Processor via email at Enquiries@bartonhall.com and the subject matter "Opt-out" in the email header.

If you withdraw your consent to any or all use of your personal Data, depending upon the nature of your request, we may not be able to provide or continue providing our products and services to you, or administer any contractual relationship already in place.

You understand and agree that in such instances where we require your personal Data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant personal Data for those purposes, we cannot be held liable for breach of that agreement. Our legal rights and remedies in such event are expressly reserved.

RETENTION OF INFORMATION

Your personal Data will be retained for as long as it is necessary to fulfil the purpose for which it is collected, for business or legal purposes, or in accordance with applicable laws.

Should you choose to unsubscribe from our mailing list, please note that your personal Data may still be retained on our database for up to 12 months or to the extent permitted by law.

COOKIES

We may set and access Cookies on Your "Computer" meaning any computer, laptop, tablet, mobile or other device that the Website can be viewed on.

A "Cookie" is a small file of letters and numbers which asks permission from your browser to be placed on your Computer's hard drive. Cookies allow web applications to respond to you as an

individual and allow us to distinguish you from other users on our Website.

The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences and allows us to improve our Website.

Our Cookies use:

- Google Analytics Cookies to identify which pages are being used. This helps us analyse data about web page traffic (the number of visitors and how visitors move around our Website when they are using it) and improve our Website to tailor it to your needs.
- Third party Cookies within our email campaigns, predominantly sent using third party email marketing tools, as well as Google Analytics. Cookies are used to monitor open rates and improve your experience and for the tracking of website activity initiated from hyperlinks within email marketing campaigns.
- Session Cookies on our Website. These are temporary Cookies, which only exist in the period you access the Website (or more strictly, until you close the browser after accessing the Website). Session Cookies help the Website remember what you chose on the previous page, therefore avoiding having to re-enter information.
- Cookies used for customer email, customer name, customer id*, token*, customer profile link*, customer flags* (*= these are generated by our own system) and social media share.

The length of time a Cookie will remain on your Computer will depend on the type of Cookie. On our Website, these Cookies do not contain personal information, and cannot be used to identify you.

To find out more about how to manage cookies through your chosen browser go to:
www.allaboutcookies.org/manage-cookies/

You may delete/disable your Cookies or manage your Cookies preferences (Please see the link on how to disable Cookies <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>). If you do decide to disable or delete the Cookies altogether our Website will not work as well as it could as it relies on Cookies to provide you with the service you have requested.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies; however, this can be altered. For further details please consult the help menu in your browser on your Computer and search for "cookies".

PHISHING

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user, in an attempt to get the user to send private information that will be used for criminal activities such as identity theft and fraud.

Save where you are sending us your signed contract such as treatment or booking form via email. We will never separately ask you to confirm any account or credit card details via email. If you receive an email claiming to be from us asking you to do so, please ignore it and do not respond.

You can contact our reception staff by phone or when you check in or by contacting our Data Processor via email at Enquiries@bartonhall.com and the subject matter "Credit Card Fraud" in the email header to report it or if you are unsure.

We will take bookings over the phone. We will give our name and name of our company when we do this. If you are anxious about the phone call, revealing your payment details or do not believe that the person on the other end of the phone is us, we suggest you put the phone down and ring us directly using the telephone number on our website asking for the person you spoke to.

LINKS TO OTHER WEBSITES

This Privacy Statement applies solely to Data collected by us. Our Website may contain links to external sites, operated by other owners and third parties, over which we have no control. For this reason, we encourage our visitors to be aware when they leave our Website to read their privacy policy applicable. Any access to such other websites or pages is entirely at your own risk. We are not responsible for the privacy policies, content or security of any third-party websites linked to our Website.

CHANGES TO OUR PRIVACY POLICY

This Privacy Policy is regularly reviewed. Following any changes, the new version of the policy will be uploaded to our Website and the old version removed. Please check back frequently to see any updates. This was updated last in May 2018

HAVE A QUESTION?

Any questions on this Privacy Statement please email: enquiries@bartonhall.com and the subject matter in the email header.