Cashel House Hotel Privacy Policy

Cashel House Hotel ("the hotel") is committed to protecting and respecting your privacy. We adhere to the Privacy Policy ("the policy") together with any disclaimers sets out the basis on which any personal data we collect from you or that you provide to us, or that is provided to us relating to you ("Data") by any means will be processed. Please read the following carefully to understand our use of your personal data. Please note that the Policy relates only to living individuals in relation to personal data relating directly to themselves, and not to persons in any other capacity.

Information we may collect from you

We collect personal data from you which you volunteer when you provide such personal data to us, or via our services with which you interact with Cashel House and/or employees of the hotel. We may also be given other personal data relating to you by other persons, or we may obtain such other personal data about you as may be provided to us in the course of our legitimate business activities.

We may collect and process Data, including the following while providing services to you, which could contain your personal data:

- your name;
- your address;
- your email addresses;
- your phone numbers including mobile phone numbers;
- financial information about you, including your bank account details, credit card details, or other payment details;
- details of contracts you have entered with third parties for us to provide services to you;
- details of your relationship to other parties;
- details of your membership of professional or other organisations;
- your date of birth;
- details of your children and other relations;
- medical details, including details of allergies;
- all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing accommodation, gym, leisure, retail, conference & banqueting, and/or food related services to you.

We may also process other data, which is not personal data:

- When you access our website or Wi-Fi facilities, your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.
- CCTV is in operation throughout the hotel for the purposes of, including but not limited to: Security of property, employees and guests; Health & Safety, and; Public Liability.
 CCTV Policy >
- We may use cookies and similar technologies to help provide our website data, offer you a more
 personalized user experience and market products and services to you.

Security and where we store your personal data

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your personal data for their own purposes. Non EEA countries may not provide an adequate level of protection in relation to processing your personal data. By submitting your data, you agree to this transfer, storing and processing.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us. Any transmission of data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access

Uses made of your personal data

We use your personal data that we hold to:

- In our legitimate interest of advertising our services, provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes (our list of services below);
- carry out our obligations arising from any contracts entered into between you and us;
- in our legitimate interest of advertising our services, provide details of any loyalty scheme or promotion;
 - comply with legislation;
- And/or notify you about changes to our services.

List of services:

- Accommodation
- Gym
- Spa
- Leisure
- Retail
- Conference & Banqueting
- Restaurant, bar service and other food related services.

We may use your data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your data in this way, please notify us to that effect.

We keep your Data for varying periods

Disclosure of your information

We may disclose your Data in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your Data in order to comply with any legal obligation, or to protect our rights, property, or safety of staff or customers.

We do not share your information with third parties other than as described above and as follows:

We may share your information with our affiliates, subsidiaries, and business partners in the U.S. and worldwide, Booking.com, Expedia.com, Hotels.com to the extent necessary for managing our business related to our Sites and the Purposes. To learn more about your choices related to how we share your information with our affiliates, subsidiaries, and business partners, please see the Your Rights section, below.

We may also share information, including but not limited to CCTV footage, to An Garda Siochana, when requested.

Links to other sites

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

Your rights

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below: –

- 1. The right to access data relating to you ('access right');
- 2. The right to rectify/correct data relating to you ('right to rectification');
- 3. The right to object to processing of data relating to you ('right to object');
- 4. The right to restrict the processing of data relating to you ('right to restriction');
- 5. The right to erase/delete data relating to you (i.e. the "right to erasure"), and;
- 6. The right to 'port' certain data relating to you from one organisation to another ('right to data portability').

Email

If you do not want to receive marketing and promotional emails from the hotel, you may click on the "unsubscribe" link in the email to unsubscribe and opt-out of marketing email communications. Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. Please note that even if you opt-out of receiving marketing communications from us, we may need to send you service-related communications, such as confirmations of any future reservations you make.

The controller for the purposes of GDPR is:

Cashel House Hotel

Changes to this policy

We reserve the right to change this Policy from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree to this Policy as modified.

Contact Us

Questions, comments, and requests regarding this Policy and the information we hold are welcome and should be addressed to us at <u>sales@cashelhouse.ie</u> or by post to :

Cashel House Hotel Cashel Connemara Co Galway 91 XE10

This Policy is subject to change and was last updated March 2019. All requests will be dealt with promptly and efficiently.

Cashel House Hotel CCTV Policy

INTRODUCTION

The purpose of this CCTV policy is to explain how information is used and captured using CCTV and retained by Cashel House Hotel and set out your rights in relation to such information.

Purpose of CCTV

Closed Circuit Television Systems (CCTV) is used by Cashel House Hotel and is installed at our hotel in line with the requirements of the business, as set out herein, and in compliance with the General Data Protection Regulation.

The purpose of the CCTV Systems are as follows:

Improving the safety and security of guests, visitors, employees and contractors by providing a means to investigate accidents and near misses so that risk management control measures can be implemented.

Providing reassurance to staff and guests that control measures are in place relating to their safety and security.

Providing assistance to local law enforcement authorities with reference to the investigation and prevention of crime.

Deterring persons from committing crimes and to enhance the opportunities for detecting those who do.

Discouraging anti-social behaviour including alcohol and drug-related crime on or about the premises.

CCTV systems for surveillance purposes are installed according to local laws and regulations. The hotel reserves the right to use information obtained by CCTV for disciplinary or performance purposes.

Access to CCTV Footage or Images

Access to the CCTV system and stored images is restricted to authorised Cashel House Hotel personnel only for the purposes set out above.

However, in appropriate circumstances, CCTV footage may be accessed:

- By local law enforcement authorities, where Cashel House Hotel is required by law to assist in the carrying out of an investigation into a crime or anti-social behaviour.
- By data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to the hotel.
- By individuals (or their legal representatives) subject to a court order.

Retention Period and Security

The images captured by the CCTV is retained for a maximum of one month from the date of recording, except where longer storage of such images may be required to assist in any of the scenarios outlined above.

The images/recordings are stored in a secure environment with access strictly limited to those who are suitably authorised.

Access Requests

You have the right to request access to CCTV footage of you by sending an email to <u>sales@cashelhouse.ie</u> or in writing to Cashel House Hotel, Cashel, Connemara, Co. Galway, Ireland.

All requests will be dealt with in compliance with the duties and requirements imposed upon Cashel House Hotel as data controllers under the GDPR.

Individuals requesting access to CCTV images may be required to supply the following to assist the data request:

- Adequate information to enable the information to be efficiently identified and located on our system.
- Sufficient information to establish that the applicant has a legitimate right to request access.
- Proof of identification through photographic identification, for example passport or driving license.
- Possible payment for any incurred costs related to any editing or masking that may be required and/or any third party fees.