

PRIVACY POLICY

Active April 2019 – March 2020

The Seren Collection (The Seren Collection Ltd, registered company no 10626575) comprising of the following hospitality businesses Grove of Narberth hotel, Coast restaurant, Beach House Restaurant, Kiosk cafes. The Seren Collection is responsible for all of the websites and its contents. As a collection our businesses respect the privacy of every individual who visits our properties and/or uses any of our websites.

This privacy policy sets out to help you understand how we collect, collate, process, share and destroy your data.

This Privacy Policy applies to information that:

- (i) You provide to us when you stay, travel or eat with us (or make enquiries to stay or travel with us); and
- (ii) We collect from you when you visit any of our websites via booking forms, cookies or opting into subscription emails.

Information we collect

Information you provide on a voluntary basis

We will collect, store and process information about you if you voluntarily provide us with such information in connection with the following:

- filling in a form on any of our websites
- filling in a physical registration card
- contacting us by telephone or face to face (e.g. in the context of making a reservation)
- sending us a letter, e-mail or social media message
- subscribing to receive a service from us (e.g. a newsletter, blog or by following us on social media)
- requesting promotional information from us (e.g., information about any of our good or services including gift vouchers)
- participating in a survey, competition or prize draw
- contributing content to us (e.g. for display on a blog)

The types of information we may obtain include:

- your name, gender, home and work contact details, business title, e-mail address, telephone number, date and place of birth, nationality
- details of food allergies/dietary requirements and special requests made (for example, relating to a disability) you provide to us
- passport and visa information, payment information, travel history and details of joint travellers
- dates of your stay or travel with us and associated charges
- purchase or delivery of products or services

- reviews and opinions about our brands, products and services
- information we receive about you from any third parties through whom you have booked your arrangements. These third party companies must demonstrate GDPR compliance to you as the data individual and us The Seren Collection. This will be illustrated in a Processor Agreement for the safety of your information.
- information we receive about you from other members of the collection (which may include information relating to travel dates, food allergies, special requests and room preferences, and details of payments made to us)

Why we collect this information

These details are taken to provide you with service or goods and an excellent standard of service however you may opt out of this service at anytime (this will not affect your statutory rights). If you have opted in, you may receive promotional offers from us via text, post or email. Please note you have the right to unsubscribe at any time.

Alternatively some information may be taken in the interest of Health and safety or any other regulatory body that we are duty bound to report to.

We may use medical or other sensitive data provided by you to better serve and meet your needs (but under no circumstances will we process any sensitive data for marketing and/or profiling purposes). Such sensitive information is only shared with the Seren Collection or our third party service providers (acting as data processors) for the purpose of providing the services you request. By making such special requests or notifying us of such preferences, you will be prompted to provide explicit consent to us sharing your information in this way. This is to ensure your requirements are fully met during your visit.

Personal information we collect automatically

When you visit one of our websites, we may also collect certain information through the use of “cookies” and other automated means. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Such information may comprise the following information:

- Date and time
- Originating IP address
- Domain name
- Type of browser and operating system used (if provided by the browser)
- URL of the referring page (if provided by the browser)
- Object requested
- Completion status of the request
- Geographic location
- Language preferences

Use of information

Typically, we will use and process your information to:

- help us create content that is relevant to our visitors
- make improvements to our websites and social media pages and ensure that content on these is presented in the most effective manner for you
- provide you with information, products or services that you request from us or which we feel may interest you
- assess and help us understand general trends and patterns relating to our business
- provide for the safety and security of our guests and visitors

- manage general record keeping
- enable us to compile anonymous, aggregated statistics that allow us to understand how users use our websites and to help us improve the structure of our websites
- enable you to make reservations, buy Gift Vouchers and payments
- meet any legal and/or regulatory requirements
- provide the products or services you request from us
- improve our products and services and to ensure our products and services are of interest to you.

The processing of your personal information for:

- all purposes concerning your booking, your stay and to provide you with the services you have requested, is managed by Seren Collection as the data controller. Your decision to provide information to us is voluntary however; if you do not provide such information you may no longer be able to benefit from our services.

We may process your personal information by both automated and manual means. We may use your information in other ways for which we provide specific notice at the time of collection.

Privacy and Electronic Communications Regulations (PECR)

PECR sits alongside the Data Protection Act and the GDPR. They give people specific privacy rights in relation to electronic communications.

There are specific rules on:

- marketing calls, emails, texts and faxes;
- cookies (and similar technologies);
- keeping communications services secure; and
- customer privacy as regards traffic and location data, itemised billing, line identification, and directory listings.

The Seren Collection has implemented a PECR policy which ensures all of the above is adhered to as the law sets out. Continuous review by our Data Protection Officers at Logic Document ensures all consumer rights under PECR are met the highest possible standards.

Sharing information

We do not sell, otherwise disclose, or share information we collect and hold about you, except as described in this Privacy Policy.

We may share your information within the Seren Collection Group, which may use this information to offer products and services to you consistent with the purposes identified in this Privacy Policy. We may also share information with service providers who perform functions and services on our behalf. Such third parties will be appointed as data processors and will be provided only with information necessary to perform the services on our behalf but are not authorised to use such information for any other purposes.

We may disclose information about you if we are required to do so by law or pursuant to legal process, or in response to a request from law enforcement authorities or other government officials.

We reserve the right to transfer information about you in the event that we sell or transfer all or a portion of our business or assets, in accordance with applicable law. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use information you have provided to us in a manner that is consistent with our Privacy Policy. Following such a sale or transfer, you may

contact the entity to which we transferred your information with any inquiries concerning the processing of that information.

CCTV

For the security and safety of our customers and staff, The Seren Collection operates CCTV on all sites. All areas under CCTV surveillance are clearly sign posted in accordance with the law. If an incident has occurred on site whilst you are present we may share the images with the relevant authorities. No unauthorised personnel will have access to your images and this will not be shared outside of our legal obligations. You have the right to request access to your images captured by CCTV at anytime. Please see section on "Your Rights" for more information on how you can do this.

Marketing

Where you place an order with us and you have opted in (or in any other case, if you have opted in to receive marketing by email or text message), we may contact you by e-mail or text message with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about and we think may interest you based on the information we hold about you. We may also use your contact details to contact you by phone or post with details of products and services that we think may be of interest to you (unless you have told us you don't want to receive these communications, or you are registered with the Telephone Preference Service). We will hold your data for a period of 18 months before redefining consent from yourself.

After the 18 month period is up, we will contact you to redefine consent via email. If we do not receive a response we will send a reminder after 7 days of the initial email. If we still do not receive a response we will contact you in a further 7 days to confirm removal from our mailing lists.

Opting Out

Although you have opted in, to opt out of marketing, please visit the contact us section of this policy. Our Data Protection Team at Logic Document will ensure you are unsubscribed immediately from future marketing.

Alternatively you may also:

- not checking the applicable box(es) on any form used to collect information from individuals
- clicking the unsubscribe link displayed in any of the marketing e-mails you receive
- otherwise requesting that we do not process your information for marketing purposes in writing to us

Improving our services

Sometimes we will use your data to help us improve the quality and functionality of the services that we offer. This includes:

- Analysing your recent visits to our website and how you move around different sections of our website for analytical purposes to understand how people use our website so that we can make it more intuitive.
- Troubleshooting, data analysis, testing, research and for statistical and survey purposes by us, all of which helps us to provide the best service that we can. Again, this information is not shared and will be reported anonymously.

Your Rights

If you wish to access, correct, update or request deletion of your personal data, you can do so at any time.

You can object to the processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.

You have the right to opt out of marketing communications that we send to you at any time. You can exercise this right by opting out of the marketing e-mails we send you via the unsubscribe button. Similarly, if we have collected and processed your personal data 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 data conducted in reliance on lawful processing grounds other than consent.

Should you wish to exercise any of your rights, please contact our Data Protection Team at Logic Document. You will find their contact details under the 'Contact Us' section of this policy.

You have the right to complain to a data protection authority about our collection and use of your personal data. The Information Commissioner's Office is the data protection authority for the UK. You may write to them at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF. Alternatively you may call them on 0303 123 1113. You may also visit their website to fill out an online complaints form at <https://ico.org.uk/make-a-complaint/>.

Destruction

We will only keep your information for as long as is needed to fulfil our duties or required to do so by law. When we destroy your information it is done so securely. If we have hard copies containing your data, we will dispose of these safely through confidential shredding services provided to us by our acting Data Protection Company Logic Document.

Changes to our 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.

Contact us

If you have any questions about this Privacy Notice or wish to exercise any of your data protection rights, please contact our Data Protection Officer at:

Email: info@logicdocument.com

Post: Should be sent for the attention of the Data Protection Officer to: Logic Document, 6 The Arcade, Stepney Street, Llanelli SA15 3TW. Logic Document operates and facilitates this contract.

Please note: All policies are managed directly by Logic Document Ltd our acting Data Protection Team. Any Data Protection related queries or concerns will be dealt with directly via Logic Document.

