Privacy Notice

Who we are
Bluebelt Hospitality Ltd gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with necessary information regarding your rights and our obligations, and explain how, why and when we process your personal data.

Bluebelt Hospitality Ltd’s registered office is at Unit 5, The Chandlery, Bradford on Avon Marina, Trowbridge Road, Bradford on Avon, BA15 1UD, and we are a company registered in England and Wales under company number 08732885. Our appointed Data Protection Officer is Miss Nikolett Zambo, who can be contacted at the above address.

Information we collect
Bluebelt Hospitality Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data we collect is:

• Name
• Date of Birth
• Home Address
• Personal Email
• Business Email
• Home Telephone Number
• Mobile Telephone Number
• Card Payment Details
• Passport Number
• Car Registration Number

We collect information in the below ways:-
Booking forms, Customer Feedback Forms, Guest Registration Forms, Online newsletter Subscription, Wifi Log-in.

How we use your personal data
Bluebelt Hospitality Ltd takes your privacy very seriously and will never disclose, stare or sell your data without your consent; unless required to do so by law. We only retain your data for as long as necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

• Booking policy- We will collect your personal data in the conjunction with our booking terms either direct or third party. The data provided only gets for the duration of the booking.
• Marketing- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interest. Such information will be non-intrusive and is processed on the grounds of legitimate interest.
• **Legal Obligation**- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.

**Your rights**

You have the right to access any personal information that Bluebelt Hospitality Ltd processes about you and to request information about: -

- What personal data we hold about you
- The purpose of processing
- The categories of personal data concerned
- The recipients to who to whom the personal data has/will be disclosed
- How long we intend to stop your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and / or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as the object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

**Sharing and disclosing your personal information**

We do not share or disclose any of your personal information without your consent, other than the purpose specified in this notice or where there is a legal requirement. Bluebelt Hospitality Ltd. use third-parties to provide the following services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

**Venue Marketing**

To manage email marketing, by processing: Name, Address, Email address, Telephone number, DOB, Partners DOB, and Anniversary. Venue marketing will then use this information to market promotions directly to customers based on their location or celebrations coming up, as well as upcoming events. https://venue-marketing.com/privacy-policy/

**Campaign Monitor**

To manage email marketing, by processing: Name, Address, Email address, Telephone number, DOB, Partners DOB, and Anniversary. Campaign Monitor will then use this information to market promotions directly to customers based on their location or celebrations coming up, as well as upcoming events. https://www.campaignmonitor.com/policies/
Safeguarding Measures
Bluebelt Hospitality Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alterations, disclosure or destruction and have several layers of security measures in place, including:- SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentications, firewalls, anti-virus/malware etc…)

Transfers Outside the EU
Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standards of protection for your personal data. Bluebelt Hospitality Ltd. does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data
You are not obligated to provide your personal information to Bluebelt Hospitality Ltd. however, as this information is required to process your booking we will not be able to do this without the information provided.

Legitimate Interest
As noted in the “How We Use Your Personal Data” section of this notice, we occasionally process your personal information under the legitimate interests’ legal basis. Where this is the case, we have carried out a thorough Legitimate Interests’ Assessment to ensure we have weighed up your interests and risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests’ legal basis for processing and have identified that our interests are all in manners in which contact is made with the hotel.

How long we keep your data
Bluebelt Hospitality Ltd only ever retains personal information for as long as it is necessary and we have strict review and retention policies in place to meet these obligations. We require under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data
Owing to the products, services or treatments that we offer, Bluebelt Hospitality Ltd. sometimes needs to process sensitive personal information (known as special category data) about you, to ensure we can cater for dietary or other requirements due to medical or religious reasons. Where we collect such information we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will need your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.
Marketing

Consent Example
Occasionally, Bluebelt Hospitality Ltd would like to contact you with events and promotions we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out / unsubscribe options on our website or by contacting Bluebelt Hospitality Ltd. directly.

If you consent to us contacting you with the above-mentioned marketing offers, please tick to say how would you like to be contacted:–

Post ☐ E m a i l ☐ T e l e p h o n e ☐ T e x t ☐ M e s s a g e ( S M S )

Legitimate Interest Example
Bluebelt Hospitality Ltd will occasionally send you information of upcoming events and promotions by email that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out / unserscribe at any time.

If you would prefer not to receive the above mentioned marketing and offers, please tick below: –

I wish to opt-out of the marketing ☐

Lodging a complaint
Bluebelt Hospitality Ltd. only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Bluebelt Hospitality Ltd.
Nikolett Zambo - Data Protection Officer
Unit 5 The Chandlery
Bradford on Avon Marina
Trowbridge Road
Bradford on Avon
BA15 1UD
Tel: 01225 282 061 Email: complaints@original.co.uk

IOC
Information Commissioner’s Office
Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 Email: casework@ioc.org.uk