

The Mandrake Privacy Policy

The privacy and security of your personal data is very important to us. We want you to trust that the information that you have provided to us is being properly managed and protected. This policy sets out how we collect, process and look after your personal data and tells you about your rights and how the law protects you.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**). We are also subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (**EEA**).

This website is not intended for children, and we do not knowingly collect data relating to children.

Change to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links or third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for this privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Personal information

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect information from you when you make a booking through the reservation system of our hotel. We use the information collected from you primarily to fulfil your hotel reservation and/or for marketing purposes.

Personal data or personal information collected during the course of the reservation and during your stay may include:

- **Identity Data** such as your name, title, marital status, gender and date of birth;
- **Contact Data** such as your billing address, email address and telephone numbers;
- **Financial Data** such as your bank account and payment card details;
- **Transaction Data** such as details about payments to and from you and other details of products and services you have purchased from us;
- **Technical Data** such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology and devices you use to access this website;
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, specific requests, feedback and survey responses;

- **Usage Data** such as information about how you use our website, products and services; or
- **Marketing and Communications Data** such as your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic or biometric data). Nor do we collect any information about criminal convictions and offences.

Purpose and data retention

We only process personal information for a specific purpose for which the data was collected and will only store and use personal information for as long as necessary for this purpose including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

You do not have to provide us with your personal data but in some cases, this means we'll be unable to fulfil your request. For example, we may be unable to complete any booking you may wish to make.

Transferring your personal data out of the UK and EEA

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to share your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

For example, we will transfer your personal data to our service providers located outside the UK.

As we are based in the UK we will also transfer your personal data from the EEA to the UK.

We will also ensure all protections required by applicable UK and EEA laws are in place before transferring personal data to any organisation or body (or its subordinate bodies) governed by public international law or set up by, or on the basis of, an agreement between two or more countries (international organisations).

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA or to an international organisation where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an **adequacy regulation**) further to Article 45 of the UK GDPR;
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an **adequacy decision**) further to Article 45 of the EU GDPR;
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Photography

To protect the privacy of our guests, we have a no photography or filming policy in place.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by booking a reservation, filling in forms or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources, such as:
 - Technical Data from the following parties:
 - analytic providers;
 - advertising networks; and
 - search information providers;

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- Identity and Contact Data from data brokers or aggregators; and
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

Legal basis

We are committed to collecting and using your information in accordance with applicable data protection laws. We will only collect, use and share information where we are satisfied that we have an appropriate legal basis. This may be because:

- you have provided your consent to us using the personal data;
- our use of your personal data is necessary to perform our contract with you, for example, making and managing your booking; or
- our use of your personal data is necessary to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities.

Marketing

We would like to send you information about products and services of ours that we think you might like. If you have agreed to receive marketing, you may always opt out at a later date.

You may have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following opt-out links on any marketing message set to you. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Change of purpose

We only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Secure environment for personal information

We are committed to protecting the confidentiality and security of the information that you provide to us.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We do not transfer your personal data outside the UK.

Disclosure of your personal data

We may share your personal data with the parties set out below:

External Third Parties:

- Service providers, who provide IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK, who provide consultancy, banking, legal, insurance and accounting services; and
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

Control and governance

To ensure your data is and stays secure, we have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the DPO on the following email address: privacy@themandrake.com.

Your rights under data protection laws

You have legal rights under data protection laws in relation to your personal data.

- Request access to your personal data by the data subject access request

Right of access means, in short, that we are required to provide you a copy of your processed personal data upon request. This enables you to check that we are lawfully processing it.

- Request rectification and erasure

Because ownership of your personal data is very important, you have the right to ask us to rectify any information about you which is incorrect (though we may need to verify the accuracy of the new data you provide us with) and ask us to erase your personal data if you think we no longer need to use it for the purpose we collected it from you. This applies also to the following situations: if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Right to restriction of processing

In certain circumstances you can ask us to restrict our use of your information, for example: where you think your information is inaccurate and we need to verify it;

- where our use of your information is unlawful, but you do not want us to erase it;
- where your information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal information but we still need to verify if we have overriding grounds to use it.

- Right to object

Data protection laws give you the right to object to the processing of your personal data in certain circumstances if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use your personal data if we can demonstrate that we have compelling legitimate interests to use the information.

You can also ask us to stop using your personal data for direct marketing purposes.

- Request the transfer

You have the right to request the transfer of data. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time

You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Complaints**

You have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in the UK is the Information Commissioner's Office.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

How do we use cookies?

We use cookies in a range of ways to improve your experience on our website, including:

- keeping you signed in;
- understanding how you use our website;
- recognising member profiles;
- personalised offerings (recognition of user to offer bespoke events or services); and
- establish a loyalty scheme (incentivise recurring visitors or registered users with personalised offers).

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** – we use these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used
- **Advertising** – we use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.
- We use permanent cookies to create personalised CMS triggered website interface experiences for registered users
- We use third party-cookies for overseeing any booking journey (rooms, events, packages, offers) to ensure financial payment gateway security
- *We will likely be making use of session cookies in a future iteration of the website once it includes an active e-commerce or any other inventory dependant customer journeys*

How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Data controller

For general data protection regulation purposes, the “data controller” means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

The data controller is:

PHG Ltd
5-11 Mortimer St,
London
W1T 3JA

How to complain

Please contact us if you have any queries or concerns about our use of your information (see below ‘How to contact us’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK, and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

The UK’s Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

How to contact us

For any questions, concerns or requests, please contact us by email: privacy@themandrake.com