

OUR PRIVACY POLICY

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Introduction

The privacy and security of your information is very important to us. Whether you are visiting our website, booking a room/restaurant/bar or function, we want you to trust the way that we manage your information and to keep you informed about how we use that information.

This notice refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Who we are

This Privacy Statement is issued by the Royal Garden Hotel which is part of the Goodwood group of hotels with the corporate office in Singapore. We provide services in the context of hospitality that includes the provision of accommodation, conference and events spaces and food and beverage outlets. This policy covers information that we collect and use in the course of our business. When we mention "the Royal Garden Hotel", "we", "us", or "our", we are referring specifically to the Royal Garden hotel that processes your personal information.

What is Personal Data?



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For the purposes of this Privacy Policy, "Personal Data" means any information provided by you when interacting with us, for example through our website or when calling us, or data is collected about you through your use of our website and allowing you to be identified personally, either directly (e.g. your name) or indirectly, because the data references an identifier such as your name, an identification number, location data, an online identifier (e.g. telephone number) as an individual person. We may also collect personal data about you in other instances which relate to your stay at the Royal Garden hotel.

Information we collect and how we use and share it

We collect personal information directly from you, information about you from other persons/entities/online channels, and automatically when you use our website, or other RGH-branded digital channels, and through certain offerings or services available at our hotel (such as hotel WI-FI). In particular, we collect and use information about you if you (or someone on your behalf) make a reservation to stay at our hotel offered through reservations, or interact with us through our corporate site or other RGH-branded digital channels. We use personal information only for the purposes described in this Privacy Statement, except if otherwise disclosed to you at the time the data is collected or otherwise authorised by law or by you, these include;

- The Royal Garden hotel uses the information collected from you to provide quotations, make telephone contact and to email you marketing information which we believe may be of interest to you and your business.
- to operate, maintain, enhance and provide all features of the service, to provide services and information that you request, to respond to comments and questions and to provide support to users.
- to understand and analyse the usage trends and preferences of our users, to improve the RHG service, and to develop new products, services, features, and functionality. If you provide your contact information or join our newsletter we may (with your consent or where permitted by applicable law) send you personalised offers based on your web usage and location. You can opt out of receiving these offers when signing in to use our service or at any time
- The Royal Garden Hotel operates CCTV systems at our properties and video recordings may be made. This activity is carried out for security and service reasons and access to these system is restricted.
- Our Royal Garden Hotel website use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. More information can be found under the Cookies Policy Section.'
- 'We use third party analytical software's including but not limited to Google Analytics to review user's online activity of our website. This information will also be recorded under these third party's privacy policy, a list of any third party analytics can be supplied on request
- Any information the Royal Garden Hotel Ltd holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.
- We will only collect the information needed so that it can provide you with marketing and consulting services, we do not sell or broker your data, although coincidentally there may be times when your information could be contained in data that the Royal Garden hotel Ltd has purchased from a third-party list broker, on behalf of a client.

You do not have to provide us with your personal information in order to use our website; in some cases, however, we may not be able to provide services to you without your personal

information (for example, we would not be able to complete a requested booking). To learn more about how we collect, use and share your information and how you can opt out.

How we collect your personal data:

Whenever you navigate our Website, data is collected and processed about you. We collect the following data:

- Information related to the browser or device you use to access our website
- IP address
- Country you are browsing from
- Browsing habits, including sites visited
- Other demographics and statistical information

The data is collected through the session cookies (with regard to cookies see also below) we use on our Website. It is anonymised, before we use it to build anonymous utilisation profiles, for marketing purposes and to optimise our Website and the services we provide. This data shall not be used in order to identify the visitor of this Website personally.

Interacting with us

Every time you interact with us (e.g. booking a room through our Website, by phone or through a third party provider, posting a comment on our blog, signing up for our newsletter) we may collect and process the Personal Data you provide to us.

Booking a room, a restaurant/bar table, or a conference/function

When you book a room, we collect Personal Data, which includes:

- Your selected dates
- Number of rooms in the reservation
- Number of people in the reservation (adults and children)
- Age of children
- The rate/special offer selected
- Any add-on packages selected
- Your full name
- Your address, including city and country
- Your e-mail address, and
- Your credit card details

Optional information

- Arrival Information
- Room, Bed type and/or other preferences
- Telephone/mobile
- Option to join our loyalty programme/Newsletter

We use this Personal Data to handle your reservation and to establish and fulfil our contract with you. This includes verifying your identity, taking guarantee and/or payment information, and sending stay-related and/or marketing communication.

We take the protection of your Personal Data very seriously and therefore have kept the mandatory required fields to a minimum.

Newsletter and special offers

If you consent to providing your contact information to us (e.g. when booking a service with us or when signing up for our newsletter via our Website), we may use this Personal Data to send you our newsletters and details of other special offers which may be of interest to you, based on previous interactions with us (e.g. bookings).

If you sign up for our newsletter via our Website, you are required to provide your email address, you will receive an email to reconfirm your interest in staying in touch (double opt-in). Any additional information is voluntary and will be used solely for a personalisation of the newsletter.

By providing your email address and subsequent confirmation via the double opt-in, you consent to receiving our newsletter. You can revoke your consent and opt out of receiving the newsletter at any time by clicking on the unsubscribe link included in every newsletter. Moreover, you also have the possibility of unsubscribing in your personal profile under "data protection". For any further objections, kindly address the contact stated at the end of this policy.

We also include web beacons in HTML-formatted e-mail newsletters in order to count how many newsletters (or particular articles, links, etc.) are being accessed, and on our website to count users who have visited these pages.

"Contact Us" functionality

You can get in contact with us via our Website by using the "Contact Us" functionality, or by telephone. To contact us you may be required to provide the following information:

- Your full name
- Your e-mail address,

Any additional information (e.g. home address) is provided voluntarily.
We use your information to reply to your enquiry.

Legal basis for processing personal data

We are committed to collecting and using your information in accordance with applicable data protection laws. We collect, use and share your information where we have an appropriate legal basis/legitimate interest to do this. When you provide your personal details to us we use your information for our legitimate business interests. Before doing this, we will carefully consider and balance any potential impact on you and your rights. The following are some examples of when and why we would use this approach.

Consent: you have provided your consent to us using the personal information;

Direct Marketing: We will send direct marketing via the postal service and by email. We will also make sure our direct marketing is relevant for you and where possible tailored to your interests.

Ordering online: In order for us to process an order, payment details are taken and contact information collected, such as name, address, telephone number, and email address.

Fulfilling our contract with you: Our use of your information is necessary to perform our contract with you, for example, making and managing your booking and operating and providing services in connection with our Loyalty Programme in accordance with the terms of our agreement with you;

Your best interest: Processing your information to protect you against fraud when transacting on our website, and to ensure our websites and systems are secure. To record details of any allergies or other concerns you may wish to bring to our attention.

Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our guests and visitors.



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Analytics: To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our activities and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

Research: To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.

Due Diligence: We may need to conduct investigations on potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption. Any communication we send in this manner will give you the opportunity to unsubscribe very easily.

Meet our legal responsibilities: our use of your information is necessary to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;

If you would like to find out more about the legal basis for which we process personal information, please contact us (details found in the How to contact us [How to contact us](#) section). If you have provided your consent to the processing of your information, you can withdraw this consent at any time by contacting the Royal Garden Hotel Privacy Office (details found in the [How to contact us](#) section).

Sharing of your Personal Data with Third Parties

Your Personal Data may be shared:

- Within the Royal Garden Hotel to establish and fulfil our contract with you or to the extent you consented to such sharing of data, for example. This includes verifying your identity, taking payments getting in contact and communicating with you.
- With our commercial partners in the event that you book an event or an activity organised by such commercial partners.
- With our third party service providers who process your data on our behalf. Royal Garden Hotel's third party service providers hosting providers (including but not limited to Wihp & Go Daddy), and providers of data analysis, IT services, and other similar services requested by the Royal Garden Hotel to provide the Website and other business-related services to you. Any data processing on our behalf complies with the applicable laws.

Communication Providers

We also use third party communication providers including but not limited to Instagram, WhatsApp, Viber, Revinat, Alliants & Twitter etc., here after referred to as Communications Providers. These Communication Providers independently control your Personal Data which is being communicated on these channels, i.e. how they process your Personal Data solely lies within their responsibility.

Additionally, to facilitate our reply and to communicate with you in real-time on the respective communication channel, your enquiries sent to us through this communication channel will be centralised in one central communication hub. We are responsible for the processing of your Personal Data on this central communication hub. This hub and your enquiries can be accessed by our relevant staff in charge. We use your information only to reply to your enquiry.

Transfer of Personal Data to a third country

Where information is transferred outside the European Economic Area or Singapore, we will ensure that appropriate safeguards are implemented. If your Personal Data is transferred to a country that is not subject to an adequacy decision by the EU Commission or the Personal Data Protection Commission of Singapore, data is adequately protected by EU Commission approved standard contractual clauses, or a third party's Binding Corporate Rules.

Social Media Buttons

On our website we have links to our active social media platforms including but not limited to Facebook, Twitter, LinkedIn & Instagram etc., hereafter referred to as 'Social Media Platforms'. The social media platform can be identified by the buttons marked with the logo of the respective provider.

When clicking on these links it will take you to that provider where Personal Data will be collected by the providers of these social media platforms. Only if you click on one of the buttons your Personal Data will be transmitted to the respective provider and stored by them (in the case of US providers your Personal Data will be stored in the USA). We neither have influence on the collected data and data processing operations conducted by the providers, nor are we aware of the full extent of data collection, the purposes or the retention periods

The data is passed on regardless of whether you have an account with the social media platform and are logged in. If you are logged in with the social media platform, your data collected by us will be directly assigned to your account with the social media platform. We recommend that you log out regularly after using a social network, but especially before activating the button, as you can then avoid being assigned to your profile with the social media platform

Information on the purpose and scope of data collection and its processing by the social media platform can be found in the respective privacy policies of these providers, where you will also find further information on your rights.

Cookies

This Cookie policy describes the different types of cookies and similar technologies that may be applied on the Website provided by Royal Garden Hotel.

What are cookies?

Cookies are used to collect data such as browser type, time spent on the Online Services, page visited, referring URL, language preferences and other traffic data. The data collected by cookies may be used to provide personalised promotional offers with you. We may also use this data to provide you with personalised promotional offers on partner websites.

You can reject or approve cookies through a pop up banner on our website. However, site and app functions will be affected. Cookies and similar technologies help our site to work properly and personalise your experience. You'll be able to browse the site without them but some standard functionality, preferences and certain features will not work.

If you wish to control your cookies refer to your browsers setting or www.allaboutcookies.org. If you would like more information about interest-based



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advertising, including how to opt-out of these cookies, please visit <http://youronlinechoices.eu/>

Types of cookies used:

Analytical Cookies: Analytical cookies are used to understand how guests interact with our website. These cookies help provide information on metrics; the number of visitors, bounce rate, traffic source

Functional Cookies: Functional cookies help to perform certain functionalities like sharing the content of the website on social media platforms, collect feedback and other third-party features.

Advertisement cookies: Advertisement cookies are used to provide visitors with relevant ads and marketing campaigns. These cookies track visitors across website and collect information to provide customised ads.

Protection of your personal data

We strive to maintain the appropriate standards of security and we have put in place robust technical and organisational measures for the protection of your Personal Data in accordance with the current state of the art technologies, especially to protect the data against loss, falsification or access by unauthorised third persons. For the transfer of particularly sensible Personal Data via the internet, such as for example credit card details, we exclusively use encrypted transmission routes and we comply with the Payment Card Industry Data Security Standards (PCI DSS) which is a set of policies and procedures intended to optimise the security of credit, debit and cash card transactions and protect cardholders against misuse of their personal information. However, the transmission of information via the internet is not completely secure. So, whilst we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk. Once we have received your personal data we will use strict procedures and security features to prevent unauthorised access. Our internal processing takes place inside a VPN which is firewalled against the open internet and inside of which any kind of communication is processed in an encrypted way. As far as third parties (i.e. external companies) that are rendering data processing services for us, we have committed them to the compliance with our data privacy regulations. The external service providers are supervised by our Data Protection Officer in terms of compliance with these regulations.

Your Rights

In respect of the collection and use of your personal data, you may:

- withdraw your consent at any time for example by unsubscribing from the newsletter under "data protection",
- ask us whether we process Personal Data about you, for which purposes, the categories of Personal Data concerned, to which categories of recipients the information has been disclosed, where possible, the envisaged period for which the personal data will be stored (or, if not possible, the criteria used to determine that period),
- inquire with us about the appropriate safeguards relating to the transfer to a third party
- have inaccurate data rectified,
- object against the further processing and request erasure of your Personal Data,
- request that the processing of your personal data is restricted by Royal Garden Hotel,



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- request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

If you have any further questions on your personal data which has been stored with us or would like to exercise your rights please refer to our Data Protection Officer via the contact details stated below.

Can I find out the personal data that the Royal Garden Hotel about me?

Royal Garden Hotel at your request, can confirm what information we hold about you and how it is processed. If the Royal Garden Hotel does hold personal data about you, you can request the following information as follows:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Royal Garden Hotel Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

We will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the Royal Garden Hotel Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to dpo@royalgardenhotel.co.uk or in writing to us at Royal Garden Hotel, 2024 Kensington High Street, London, W84PT

Retention and deletion of Personal Data

We will retain your personal data only for a limited period of time needed to fulfil the purposes of processing mentioned above. After that time your personal data will be erased.

Where we enter into a contract with you, we will keep your information for the duration of the contractual relationship you have with us, and, to the extent permitted, after the end of that relationship for as long as necessary to perform the purposes set out in this notice. The criteria to determine the storage period are statutory and contractual requirements, the nature of our relationship with you, the nature of the data concerned and the technical requirements. Laws may require us to hold certain information for specific periods.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data so that we can respect your request in future.

In other cases, we may retain data for an appropriate period after any relationship with you ends to protect itself from legal claims, or to administer its business.

Updates

This Privacy Policy may be updated periodically. On some occasions, we may also actively advise you of specific data handling activities or significant changes to this Privacy Policy, as required by applicable law.

Contact

In the event that you wish to contact us or make a complaint about how your personal data is being processed by the Royal Garden Hotel (or third parties as described above), or how your complaint has been handled, please contact the supervisory authority and the Royal Garden Hotel's data protection representatives, Data Protection Officer.

The details for each of these contacts are:

Data Protection Officer (DPO): DPO, Royal Garden Hotel, 2-24 Kensington High Street
London W8 4PT dpo@royalgardenhotel.co.uk +44 (0) 207 937 8000

Supervisory authority contact details: Information Commissioner's Office, Wycliffe Water lane
Wilmslow, Cheshire SK9 5AF. ICO Website for contact 0303 123 1113 (local rate) or 01625 545
745 if you prefer to use a national rate number