



Southwater Event Group Privacy Policy 2018

This privacy policy sets out how Southwater Event Group* uses and protects any information that you give the Group when you use any of our websites (including our mobile websites and apps) or otherwise interact with us; and how we will use and store that information.

It is important that you read this policy in full to understand our views and practices regarding your personal data and how we will use it, process it and delete it. It's also important that you understand your rights with regards to your data that we hold.

Southwater Event Group is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our website or other engagement methods, then you can be assured that it will only be used in accordance with this privacy statement and compliant with the Data Protection Act (1998) and the General Data Protection Regulation (2018) (from 25 May 2018 onwards).

* Southwater Event Group is a parent company for: the Telford International Centre Ltd, Stagecraft UK Ltd, Telford Hotel Ltd (Trading as Holiday Inn Telford), International Hotel (Telford) Ltd and Grays Hotel Telford (Trading as Ramada Telford Ironbridge), Southwater Developments Ltd, Southwater Hotel Ltd, Caffè D'Italia Ltd.

For the purpose of the Data Protection Act 1998 and the General Data Protection Regulation (2018), the data controller is the Southwater Event Group.

We collect personal information from you in order to help us do business together, to help us understand your specific requirements in more detail, to make sure we are able to market our services and products appropriately and to make sure you get the level of service and experience you would expect.

The following list of personal information is not exhaustive, and when we ask for any personal information, we will let you know what we are going to do with it, how long we will keep it and how we will delete it. If you do not want us to keep any such data you can tell us at any time, and we will act in accordance with your wishes – unless it is unlawful for us to do so. Personal information can include:

- First and last names and job title (if appropriate)
- Contact information including email address, business/ home address and a contact telephone number
- Geo-demographic information such as postcode, preferences and interests in relation to our business
- Other information relevant to customer surveys and/or offers or other marketing or advertising activities
- Website cookies, IP addresses and social media or email activity

WHAT DO WE DO WITH THE INFORMATION WE GATHER

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping about who we do business with, or think we may do business with in the future
- We may use the information to improve our products and services
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email/ postal address which you have provided. If you are a previous customer we will only contact you with information about services or offers that are similar in nature to the ones previously bought
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests
- From time to time, where we consider it appropriate to do so and we believe we have a legitimate business interest to do so, we may share personal information across Group businesses
- We may share your information with selected third parties including:
 - Suppliers and sub-contractors for the performance of any contract we enter into with them or you
 - Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others
 - Analytics and search engine providers that assist us in the improvement and optimisation of our websites
- We will never sell your details to any other company for the express purpose of any other marketing activity

SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place electronic systems as well as physical and managerial procedures to safeguard and secure the information we collect either online or in hard-copy format. We have a privacy policy and procedures document which all employees are made aware of and are expected to follow.

HOW WE USE COOKIES, IP ADDRESSES AND EMAIL ACTIVITY

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may register your IP address.

We may collect information relating to how you respond to our emails and whether you open them and click the links.

Also if you engage with us on social media we may collect your information for communicating with you again in the future.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on any of the websites, look out for the specific details about what this information is going to be used for, you can then click the box to indicate that you are happy for the information to be used in this way.
- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at marketing@southwatereventgroup.com or by controlling your personal preferences in the appropriate 'preferences hub' which the Group may provide in some circumstances

HOW WE MIGHT DISCLOSE YOUR INFORMATION

We may share your personal information with other Southwater Event Group companies and any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We will only do this where we feel we have a legitimate business interest to do this. We may also disclose or share your information with other legal authorities, if required under law to do so.

WHERE WE STORE YOUR PERSONAL DATA

-The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy, and all data processing will still be fully covered by the Data Protection Act (1998) and General Data Protection Regulation (2018).

All information you provide to us is stored on our secure servers or held, physically, in secure areas of our businesses. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data by providing encryption software, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

Under the General Data Protection Regulations your rights as an individual are:

- a right to object to processing that is likely to cause or is causing damage or distress;
- a right to prevent processing for direct marketing;
- a right to object to decisions being taken by automated means;
- a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to claim compensation for damages caused by a breach of the Act.

ACCESS TO INFORMATION

You have the right to access any information held about you by the Group. Your right of access can be exercised in accordance with the General Data Protection Regulation (2018). You do not have to pay any fee from May 2018 under the General Data Protection Regulation (2018) unless the request for data is 'manifestly unfounded or excessive'. We will provide you with the data you requested within 30 days of your request or communicate with you if this is not possible, and tell you why it is not possible and what the associated timescales are.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on the privacy policy page of the Group and Group businesses' websites. Where appropriate you will be notified by email.

You should also check this page from time to time to ensure that you are happy with any changes to this policy.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to marketing@southwatereventgroup.co.uk

Last updated: 21 May 2018