

Introduction

Welcome to the Clonmel Park Hotel's privacy notice.

Clonmel Park Hotel respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when visit us or use our website and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here [LINK]]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Clonmel Park Hotel collects and processes your personal data, including any data you may provide through our website, when you make an enquiry on your own or a third party's behalf, when you stay with us, visit our hotel, sign up to our newsletter, purchase or avail of a product or service or take part in a competition.

We do not sell directly to children, normally if you are under the age of 18 you will need to be accompanied by an adult such as parents, guardians or other adult family members in which case they are required to take responsibility for your privacy.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Bonaventura LTD t/a Clonmel Park Hotel is the controller and responsible for your personal data (collectively referred to as ["HOTEL NAME"], "we", "us", "the Hotel" or "our" in this privacy notice).

We are operated by Tetrarch Hospitality, both organisations having their registered office at Heritage House, 23 St Stephen's Green, D02 AR55, and data may be shared with Tetrarch Hospitality

in the event of, for example, an insurance incident, multiple property enquiry or significant event arising that requires Director level input.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights], please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Bonaventura Clonmel Ltd- Trading as Clonmel Park Hotel

Email address: Dp@clonmelparkhotel.com

Postal address: Clonmel Park Conference, Leisure & Spa Hotel, Clonmel, Co. Tipperary

Telephone number: +353 52 6188700

This version was last updated on 24th May 2018.

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.

We reserve the right in its sole discretion to amend this privacy statement at any time. You should regularly check this privacy statement for any amendments.

Third-party links

Our website may include links to 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 their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an identified or identifiable individual which is linked to that person by reason of the content, purpose or use of the information. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

a) Identity Data includes first name, last name, date of birth, email address, postal address, phone number, vehicle registration number, and preferences for your stay. In the case of our corporate customers, we may also process job description, company name and contact details.

b) Financial Data includes payment card details.

c) Transaction Data includes details about payments to and from you, reservation dates and other booking details of products and services you have purchased from us.

d) Technical Data includes IP address, click stream data which shows the traffic of your visit around this web site, the previous website address from which you reached us and the type of device you are interacting with us on.

e) CCTV Data: includes video and [SOUND] captured and recorded on our CCTV system.

f) Health Data: includes information on allergies, mobility or other restrictions, medical conditions, sickness or injuries.

g) Marketing and Communications Data includes 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 may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Technical 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 notice.

We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. 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 Data, Health Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - book or purchase our services, including booking and purchasing
 - o accommodation,
 - o meeting rooms and/or event space
 - o meals in our restaurants,
 - o in our gym and
 - o swimming pool and at our spas;
 - o other recreational facilities such as kid's club, hairdressers, equestrian centre, archery and adhoc lessons/sessions
 - subscribe to our service, newsletter or publications;
 - participate in any rewards programme;
 - request marketing to be sent to you;
 - participate in market research;
 - enter a competition, promotion or survey; or

- provide some feedback on your experience via third party travel websites or directly with the hotel.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy [LINK] for further details. These can be broken down as follows

Session Cookies

Session cookies last only for the duration of your visit and are deleted when you close your browser. They are essential for secure user navigation through the site and enable the delivery of basic functionality. Specifically they ensure the security and integrity of your session through the booking journey

Persistent Cookies

Persistent cookies last after you have closed your browser, and allow us to remember your actions and website preferences. Clonmel Park Hotel uses persistent cookies to analyse customer visits to our sites. These cookies help us to understand how visitors arrive at and use our sites so we can improve the overall guest on-line experience.

Analytics Cookies

Finally, we use analytics cookies to help us make our websites even better for those who visit them regularly. This type of cookie helps us to further understand how individual visitors use our website and allows us to improve the overall delivery and user experience.

Our Hotel also has a CCTV system installed to safeguard persons and property on the premises and in its environs. We automatically capture and record video images of persons on and around the premises. All areas in which CCTV is installed will be clearly identified through signage, if you have any questions, please contact us for more details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below:
 - Identity and Financial Data from third party booking sites and third party agents that we use to manage bookings for our services.
 - Technical Data from the following parties:
 - (i) analytics providers [such as Google based outside the EU];
 - (ii) advertising networks [such as Google, Facebook, Twitter, Pintrest or Instagram based [inside **OR** outside] the EU]; and
 - (iii) search information providers [such as examples Google, Bing etc based [inside **OR** outside] the EU].

- Identity, Financial and Transaction Data from providers of technical, payment and delivery services AIB Banking Services based inside the EU.
- In the event of an incident or accident, the person accompanying you, the event organiser or the EMS may be asked to identify you;
- You may book a gift card or make/pay for a reservation on a third party(ie)'s behalf – in such an instance it is your responsibility to ensure the party(ies) give their consent for you to do so and to share their personal data in accordance with this privacy policy.
- From a partner property in the event of an overbooking or emergency relocation situation.
- [ANY OTHER WAYS YOU COLLECT PERSONAL DATA].

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- For the prevention of fraud or default.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. In some cases we will rely on a soft opt-in to send electronic direct marketing messages when you have purchased services from us. You have the right to withdraw consent or to opt out of marketing at any time by contacting us or by following the instructions for opt-out contained in our electronic marketing.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enquire about and to reserve a room	(a) Identity (b) Financial (c) Transaction	Performance of a contract with you Necessary for our legitimate interests: to study how customers use our services

	(d) Technical Data	
To check in as a guest	(a) Identity (b) Financial (c) Transaction (g) Marketing and Communications Health	Performance of a contract with you Necessary for our legitimate interests: to recover debts due to us; for direct marketing purposes; and to study how customers use our services We are required by law to keep a register of guests. To protect your vital interests by enquiring if you have any mobility or impairments that require additional assistance in the event of an emergency or evacuation
To enquire about and to book an event/ meeting space	(a) Identity (b) Financial (c) Transaction (d) Technical Data	Performance of a contract with you Necessary for our legitimate interests: to recover debts due to us; for direct marketing purposes; and to study how customers use our services
To enquire about, book and to eat in our restaurants	(a) Identity (b) Financial (c) Transaction (d) Technical Data (f) Health	Performance of a contract with you Necessary for our legitimate interests: to recover debts due to us; for direct marketing purposes; and to study how customers use our services To protect your vital interests by ensuring that you are not served food to which you are allergic.
To enquire about and to use our spa or leisure club or recreational facilities	(a) Identity (b) Financial (c) Transaction (d) Technical Data (f) Health (g) Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests: to recover debts due to us; for direct marketing purposes; and to study how customers use our services You may explicitly consent to us processing your health data when you use our spa or leisure club.
Kids club facilities	(a) Identity (b) Financial (c) Transaction (f) Health (g) Marketing and Communications	Certain personal data of children is processed when a parent/guardian avails of our kids' club: Performance of a contract with you Necessary for our legitimate interests: to recover debts due to us; for direct marketing purposes; and to study how customers use our services You may explicitly consent to us processing your health data when you use our kids club [INSERT].
Security	(a) Identity (e) CCTV	It is in our legitimate interest to process identity and CCTV data in the interests of the protection of person and property on the premises and in its environs. A balance is struck between our interests and those of the data subject by processing CCTV data according to this policy and our CCTV Policy.

Health and Safety	(a) Identity (e) CCTV (f) Health	It is in our legitimate interests to process data about accidents in order to comply with our legal obligations, to seek legal advice, defend claims and to engage in insurance risk assessments
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (d) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (d) Technical (g) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(d) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (d) Technical (g) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, and Technical 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 signed up to our database or purchased similar goods or services from us and, in each case, 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 company outside the hotel for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the instructions for opt-out contained in our electronic marketing or by contacting us on the email address provided in the Contact section of this document.

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.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see COOKIE POLICY.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary].
- External Third Parties as set out in the [Glossary] including:
 - o Our insurers, lawyers and their nominees and An Garda Síochána for the purposes of investigating crimes and for handling claims resulting from such incidents.
 - o Our insurers and their nominees for the purpose of handling claims in relation to accidents on the premises.
 - o The Health and Safety Authority pursuant to our obligation to report certain accidents.
 - o Debt recovery agencies for the recovery of any debts.
 - o Relevant agencies and authorities in the event of fraud investigation or detection.
 - o Partner properties in the event of an overbooking or emergency relocation situation.
- 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 notice.

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 and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA) except where such information may have originated outside the EEA and you or your agent is so based or where we are required by law or we believe it is in your vital interests to do so.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy and you can request the relevant section from us by contacting us on the email address provided in the Contact section of this document.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us via any of the mediums provided in the Contact section of this document and we will endeavour to resolve them as soon as practically possible.

You have the right to make a complaint at any time to the Data Protection Commissioner (DPC), the Irish supervisory authority for data protection issues (www.dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Transfer to Tetrarch Group Companies

External Third Parties

o Service providers acting as processors based [SPECIFIC COUNTRIES] who provide IT and system administration services, security services and booking services:

☐ Booking Engines

☐ Agents

☐ Security services

☐ IT Services

o Professional advisers including lawyers, bankers, auditors and insurers based in Ireland who provide consultancy, banking, legal, insurance and accounting services.

o Revenue Commissioners, regulators and other authorities based who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. 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.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. 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 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.