

Barons Eden Guest Privacy Policy

Last Updated: 25/10/2024 V4

Barons Eden Limited and its affiliated companies are committed to safeguarding and respecting the privacy of our guests. This Guest Privacy Policy outlines how we collect, use, store, and protect your personal data when you visit our hotels, spas, and restaurants.

For information regarding how we collect and use data through our website, please see our Website Privacy Policy at <https://baronseden.com/privacy>.

1. Data We Collect

We may collect and process the following personal data about you:

- **Personal Information:** Name, address, phone number, email, and booking details (such as visit dates, reservations).
- **Health Information:** Details related to health that you provide when booking spa treatments (to ensure safe and tailored services). **Health information is confidential and not shared with any third parties.**
- **Payment Information:** Payment details when you make a booking or purchase services.

Where We Obtain Personal Data

We collect personal data directly from you when you make a booking, visit our locations, or engage with our services (e.g., reservations, spa treatments, payment processing).

2. How We Use Your Data and Lawful Basis for Processing

We process your personal data for the following purposes:

Purpose	Lawful Basis for Processing
Managing bookings, reservations, and services	Performance of a contract: To fulfill our obligations when you book services or make reservations with us.
Personalising your experience	Legitimate interests: To enhance the guest experience and provide tailored services based on your preferences and feedback.
Processing payments	Performance of a contract: To process payments for services and goods purchased during your stay.
Sending pre-arrival and review emails (via Revinate)	Legitimate interests: To manage and improve our services by obtaining guest feedback.
Marketing (if opted in)	Consent: We will send you marketing communications only if you have opted in.

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Purpose

Lawful Basis for Processing

Storing health information for spa treatments **Explicit consent:** We will process sensitive health information provided by you only with your consent, for safety purposes.

You can withdraw your consent for marketing or health data processing at any time by contacting us at gdpr.requests@baronseden.com.

3. Disclosure of Personal Data

We share your personal data with the following trusted third parties, all of whom are GDPR-compliant:

Business Name	Purpose	Data Shared
ResDiary Ltd (part of Access Group)	Restaurant booking management	Name, contact information, reservation details
Agilysys	Point-of-sale services	Name, transaction details
Revinat	Customer reviews and marketing	Name, email address (for pre-arrival emails and reviews); added to marketing list only if opted in
Planet Payments	Payment processing	Payment details, transaction data

We also share personal data in the following circumstances:

- **Within Our Group:** We may disclose data to other companies within Barons Eden's Group, including **Hoar Cross Hall Limited** and **Eden Hall Day Spa Limited**, to manage services across locations and improve guest experience.
- **Professional Advisors and Service Providers:** We may share data with professional advisors, such as legal counsel or auditors, and service providers who support our business operations.
- **Legal Obligations:** We may disclose your data if required by law, regulation, or legal process, such as to law enforcement agencies or government authorities.
- **In the Event of a Business Transaction:** If we sell, transfer, or merge parts of our business or assets, your personal data may be disclosed to prospective buyers or merged with other business entities.

We have Data Processing Agreements (DPAs) in place with these third parties to ensure your data is handled securely and in compliance with GDPR.

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4. Your Rights Under GDPR

You have the following rights concerning your personal data:

- **Right to Access:** Request a copy of the personal data we hold about you.
- **Right to Correction:** Request corrections to inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of your personal data ("right to be forgotten").
- **Right to Restrict Processing:** Request that we restrict processing in certain circumstances.
- **Right to Object:** Object to our processing of your personal data where we rely on legitimate interests.
- **Right to Data Portability:** Request that your personal data be transferred to another provider.

If we are processing your personal data based on **consent**, you have the right to **withdraw your consent at any time**. This will not affect the lawfulness of processing based on consent before withdrawal.

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** if you believe we are mishandling your data. You can contact the ICO via their website at www.ico.org.uk.

5. Data Retention

We retain your personal data only as long as necessary to fulfil the purposes outlined in this policy. Specifically:

- **Guest data from previous bookings:** Stored to streamline future visits but can be deleted upon request.
- **Payment data:** Retained for as long as required by accounting and legal obligations.
- **Health information:** Retained for the duration of your spa treatments and kept securely until no longer needed.

If specific retention periods cannot be given, we use the following criteria to determine retention:

- The length of time we have a relationship with you as a guest.
- Legal requirements or guidance from regulatory bodies.
- The necessity of retaining data to resolve disputes or maintain business records.

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6. Providing Personal Data

In order to fulfil our contract with you (e.g., process bookings, reservations, or spa treatments), you must provide certain personal information. Failure to provide this data may result in us being unable to complete the requested service or booking.

For example:

- **Booking Information:** If you do not provide necessary details such as your name and contact information, we cannot complete your booking or reservation.
- **Health Information:** Without your consent for processing health-related data, we may be unable to offer specific spa treatments that require health disclosures.

7. International Transfers

We primarily process your data within the UK/EEA. If, for operational reasons, we transfer your data outside the UK or EEA (for example, if a service provider is located outside these areas), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) approved by the European Commission, to protect your data.

8. Data Security

We implement appropriate technical and organisational measures to protect your personal data from unauthorized access, loss, or disclosure. Access to personal data is restricted to employees and service providers who need it for legitimate business purposes.

9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal obligations. Guests will be notified of significant changes via our website or through direct communications.

10. Contact Us

If you have any questions about this privacy policy or wish to exercise your rights under GDPR, please contact our Data Protection Officer:

Matt Wesson (Data Protection Officer)

Email: gdpr.requests@baronseden.com

Telephone: 01608 670346

Postal Address:

FAO: Matt Wesson

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