



## **4C GROUP PRIVACY NOTICE & DATA POLICY**

## **INTRODUCTION**

4C Group is committed to protecting the privacy and security of your personal information. We take privacy and confidentiality very seriously and are therefore committed to respecting and protecting the privacy and rights of all those whose data is held by us.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). This privacy notice has been developed in order to help you to better understand the ways in which we collect, manage, process, store and share information about you, as well as details on how you can have control over the use of your data.

This policy applies to all current employees, workers and contractors, as well as former employees, workers and contractors.

4C Group is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to inform you of the details contained in this privacy notice.

## **DATA PROTECTION PRINCIPLES**

In order to comply with data protection laws in the UK, we must agree that personal information we hold about you is:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **THE KIND OF INFORMATION WE MAY HOLD ABOUT YOU**

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).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, country of origin, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependents
- Next of kin and emergency contact information
- CCTV footage and other information obtained through electronic means such as swipe card records.
- Information about your use of our information and communications systems.
- Photographs.
- Credit card details (only in secure transactional related system)
- Membership card numbers of any loyalty program
- Your dates of arrival and departure
- Your preferences and interests, e.g. preferred location of room (low floor, high floor), type of bed, preferred newspaper, sports and cultural interests
- Any questions/comments you may have during or after your stay in one of our hotels.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, falls, trips and allergies etc.
- Information about criminal convictions and offences.

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We initially collect personal information about guests through booking systems.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

We will only use your personal information in line with the way the law allows us to do. In most cases, we will use your personal information in the following circumstances:

1. Where we need to perform the duties, we have entered into with you, such as:  
To deal with your enquiries and requests

To book and reserve hotel rooms and requested accommodation.  
To establish and maintain business records and comply with accounting requirements and local regulations.  
To manage guests' complaints  
To let you benefit from our loyalty program/ administer membership records.  
To implement security and fraud prevention means

2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

For more details about examples of situations in which we may use your personal information, please contact the Data Protection Team on [dataprotection@4cgroup.co.uk](mailto:dataprotection@4cgroup.co.uk)

### ***Situations in which we will use your personal information.***

The information that you provide to us, as described in the preceding section, allows us to perform our duties with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### ***Change of purpose***

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent
2. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to an incident.

### ***Do we need your consent?***

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

## DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

### ***Why might you share my personal information with third parties?***

We will share your personal information with third parties either:

- where required by law;
- where it is necessary to administer the working relationship with you; or
- where we have another legitimate interest in doing so.

### ***Which third-party service providers process my personal information?***

"Third parties" includes third-party service providers (booking.com, choice hotels, Marriott, including contractors and designated agents) and other entities within our group.

The following third-party service providers may process personal information about you for the following purposes:

- Hotel Brands – IHG, Hilton, Marriott, easyHotel PLC, Choice Hotels for training purposes
- Saeker Systems Limited - Health & Safety Management
- Maisha IT Software – IT Security & Data Management

### ***How secure is my information with third-party service providers and other entities in our group?***

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### ***When might you share my personal information with other entities in the group?***

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

### ***What about other third parties?***

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

## **DATA SECURITY**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Team.

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

## **DATA RETENTION**

### ***How long will you use my information for?***

We will only retain your personal information 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

### You have rights relating to your personal information:

- The right to be informed about how your personal information is being used (like this notice!)
- The right to access the personal information we hold about you.
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request that we delete your data, or stop processing it or collecting it, in some circumstances.
- The right to stop direct marketing messages, and to withdraw consent for other consent-based processing at any time.
- The right to request that we transfer or port elements of your data either to you or another service provider.
- The right to complain to your data protection regulator — in the UK, the relevant supervisory authority is the Information Commissioner's Office (ICO). You can contact the ICO via their web-form at <https://ico.org.uk/concerns/> or call the ICO helpline on +44 (0)303 123 1113.

If you want to exercise your rights, have a complaint, or just have questions, please contact us, via [dataprotection@4cgroup.co.uk](mailto:dataprotection@4cgroup.co.uk).

Further information on your rights can be found below.

### ***Your rights in connection with personal information***

Under certain circumstances, by law you have the right to:

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

**Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure of your personal information.** This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

**Object to processing your personal information** 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. You also have the right to object where we are processing your personal information for direct marketing purposes.



**Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer of your personal information to another party.**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [dataprotection@4cgroup.co.uk](mailto:dataprotection@4cgroup.co.uk) in writing.

### ***Fees***

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

### ***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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO via The Data Protection Team at [dataprotection@4cgroup.co.uk](mailto:dataprotection@4cgroup.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.