



## Privacy Policy

Drimvargie Limited, 931 Sauchiehall Street, Glasgow G3 7TQ With Company Number SC143661, operates the Devon Cove Hotel, and is the Data Controller of, and the entity responsible for, the personal information covered by this Policy. References in this Policy to “DL”, “we”, “us”, and “our” are references to Drimvargie Limited.

This Policy applies to the personal information we obtain through our various sources, including websites, mobile applications, social media pages, supplier engagement, third-party sources, and engagement with our guests, contacts, and other relevant third parties. Some of these channels may provide links to other third-party websites and features, or contain third-party cookies, that are not owned or controlled by DL. We are not responsible for the privacy practices of third parties, which are subject to their respective privacy policies.

We have developed this Policy to explain how we manage and use your personal information and to ensure we comply with our legal obligations under applicable data protection laws. It is important that you read this Policy carefully so that you are fully aware of how we collect and process your personal information.

### Hotel Guests

A hotel "guest" is someone who makes a booking, or stays, or uses any of the services, at the Devon Cove Hotel.

The personal information we collect about our guests may include name, email address, home and/or business address, phone number; bank account and payment card information; booking history; transactional data including details about payments to and from you and other details of products and services you have purchased from us; information relating to your use of our services, such as room preferences, special requests, feedback and survey responses; and marketing preferences. We will collect this personal information from you when you provide it to us by phone, email, post, through our website or in person.

The legal basis for us processing your personal information will typically be one of the following: your consent; performance of a contract with you or a relevant party; our legitimate business interests; or compliance with our legal obligations. Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting by email to [info@devoncovehotel.com](mailto:info@devoncovehotel.com)

We intend to use your personal information (i) to fulfil your bookings and/or to provide services or facilities you request from us; (ii) to collect payment from you; (iii) to administer and manage our relationship with you, which may include asking you to complete surveys or feedback forms; (iv) where you have made a reservation with us, to send you information before your visit to confirm the reservation and to provide you with other information relating to your reservation which we think you may find of interest; (v) to send you marketing and promotional material where we think this may be of



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interest to you (unless you have objected to receiving this by contacting us; (vi) where required by law; and (vii) where necessary to protect your health or well-being or that of another individual.

### **Hotel Contacts**

A hotel "contact" is someone who makes an enquiry, or contacts us, on our website or in person or by letter, phone, email or text

The personal information we collect about our contacts may include name, email address, home and/or business address, date of birth, phone number; and marketing preferences. We will collect this personal information from you when you provide it to us by phone, email, post, through our website or in person.

The legal basis for us processing your personal information will typically be one of the following: your consent; our legitimate business interests; or compliance with our legal obligations. Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us by email to [info@devoncovehotel.com](mailto:info@devoncovehotel.com)

We intend to use your personal information (i) to fulfil your enquiry or requests of information; (ii) to administer and manage our relationship with you, which may include asking you to complete surveys or feedback forms; (iii) to send you marketing and promotional material where we think this may be of interest to you (unless you have objected to receiving this by contacting us by email to [info@devoncovehotel.com](mailto:info@devoncovehotel.com)); (vi) where required by law; and (vii) where necessary to protect your health or well-being or that of another individual.

### **Marketing**

You may receive marketing communications from us (i) if you have specifically requested that information from us; or (ii) by email, text or post if you are a guest and you have not opted out of receiving that marketing; (iii) by post, if you have not opted out of receiving that marketing. Otherwise, we will not send you any marketing communications unless we have your explicit consent.

Please note, you can ask us to stop sending you marketing messages at any time either opting out if there is an "opt out" option or by contacting us by email to [info@devoncovehotel.com](mailto:info@devoncovehotel.com).

### **Personal Information Requests**

Where we need to collect personal data by law or under the terms of a contract for services that we have with you and you fail to provide that data when requested, e.g. name, address, contact details, payment details etc. we may not be able to perform the services under the contract we have. In this case, we may have to cancel a service you have booked with us but we will notify you if this is the case at the time.

### **Sharing Your Personal Information with Others**



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We will not disclose personal information we hold about you to any third party except where required by law or to companies in the DL group; to third parties who provide services to us, and act as data processors for us; to professional advisers including lawyers, bankers, auditors and insurers; to HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances. Also in the event that we divest any business or assets, we may disclose personal information we hold about you to the prospective and actual buyer of such business or assets. 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 Policy. Please note that 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.

### **Transferring your Personal Information outside the EEA**

We do not intend to transfer any personal data we hold about you to a country outside the European Economic Area ("EEA"). If however we do transfer your personal data out of the EEA, we shall ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards applies: (i) the countries to which it is transferred have been deemed to provide an adequate level of protection for personal data by the relevant regulators; (ii) we have put in place with the transferee specific contracts approved by the relevant regulators which give personal data similar protection to that it has in Europe; or (iii) if the transferee is in the US, it is registered with the EU-US Privacy Shield (or any similar replacement scheme)

### **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.

### **How long do we keep your Personal Information?**

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 you can ask us to delete your data.



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In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. We will take all reasonable steps to destroy, or erase from our systems, all the personal information we hold about you when it is no longer required.

### **Your rights & access to your Personal Information**

Under current data protection laws, you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to certain processing and in some cases the right to data portability. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

To request to exercise these rights, please contact [info@devoncovehotel.com](mailto:info@devoncovehotel.com). To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

### **Changes to this Policy**

We may need to make changes to this Policy from time to time to take account of changes in law or the needs of our business. Please refer back to this page regularly to see any changes or updates to this Policy.

### **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.

### **How to Contact us**

If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us by either post to the hotel address (clearly marked for "Data Protection Team") or by email to [info@devoncovehotel.com](mailto:info@devoncovehotel.com) with "FAO - Data Protection Team" in the subject line and marked as high importance.



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Thank you,

Devoncove Hotel