

EHL Privacy Statement

Elegant House Liverpool (EHL) collects sufficient information from customers to reserve and take payment for Bed and Breakfast accommodation including booker and guest name(s), telephone number, email / postal address, credit card / debit card details and any special dietary / access information you may share with EHL to improve your stay. When you provide your data you are confirming your acceptance of our Privacy Policy. You have the right to request details, edits and deletion of personal data held about you at any time by contacting service@eleganthouseliverpool.com Such requests made within eight days of your scheduled arrival will be subject to the terms of our cancellation policy.

EHL Data Management & Privacy Policy

1. Data Protection Law:

The General Data Protection Regulation (GDPR) applies in the UK and across the EU from May 2018. It requires personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed for additional purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and up to date.
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
6. Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
7. The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

2. Scope of personal information processed

2.1 Data Collection:

Elegant House Liverpool (EHL) collects sufficient information from customers to reserve and take payment for Bed and Breakfast accommodation including booker and guest name(s), telephone number, email / postal address, credit card / debit card details and any special dietary / access information you may share with EHL to improve your stay. When you provide your data you are confirming your acceptance of our Privacy Policy.

2.2 All information is supplied to EHL either by:

[i] The customer, or by their travel agent (by telephone, email or postal correspondence). It is the customer / agent's responsibility to provide EHL with any necessary data updates prior to, during and in the 14 days after departure.

[ii] EHL's partner Online Travel Agents (OTA's) e.g, *Booking.com*, email EHL with reservation details including booker and guest name(s), telephone number, email / postal address, credit card / debit card details. Once a reservation has been processed your

credit / debit card details are no longer made available to EHL from this source. OTAs share data with EHL via an online password-protected and encrypted file as per their Privacy Policy.

2.3] Data Sharing: In order to process your card payment EHL will share your details with an electronic payment processing company, e.g. WorldPay. Such data includes cardholders name, telephone number, email / postal address, credit card / debit card details. Once a payment has been processed your credit / debit card details are no longer made available to EHL from this source. Electronic Payment Processing Companies share data with EHL via an online password-protected and encrypted file as per their Privacy Policy.

2.4] Data Storage: EHL collects your data at the time of reserving your booking and deletes it within 14 days of your departure. EHL will delete data pertaining to cancelled bookings within 14 days of cancellation. In that time, EHL stores your data on-line in a password-protected and encrypted file. Your data is not held on computer hard drives or as paper hard-copy.

3] Security Measures:

EHL is continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information include firewalls, data encryption and information access controls.

1. Privacy Impact Assessment: The process described at Section 2 above aims to minimise your risk of data breach by
 - minimising the scope of Personal Data collected ,
 - storing data for the minimum amount of time necessary
 - ensuring security software is kept up to date
 - sharing with external organisations only when necessary to process payments

3.2] The right to be forgotten:

Personal data will be removed from all online storage including the bookings calendar, email contacts and the secure data file within 14 days of completion of your stay, or booking cancellation, unless you specifically ask EHL to stay in touch.

3.3] Privacy notices

EHL aims to ensure that individuals are aware that their data is being processed, and that they understand:

- Who is processing their data

- What data is involved
- The purpose for processing that data
- The outcomes of data processing
- How to exercise their rights.

To these ends EHL has a Privacy Statement(see above) setting out how data relating to individuals is used. It is viewable on www.eleganthouseliverpool.com/rooms-bookings EHL’s Privacy Notice is viewable above. It summarises the Privacy Statement and Data Management Policy and has a hyperlink to them. It is contained in all company policy statements and email footers.

4] Ongoing documentation of measures to ensure compliance

Meeting the obligations of the GDPR to ensure compliance will be an ongoing process. This policy in full along with a detailed management structure for its implementation will be kept updated in the GDPR file and used in induction of any new staff. EHL will maintain records showing training of employees on privacy and data protection matters. EHL will review processes and software annually.

4.1] Everyone who processes or stores data for Elegant House Liverpool contributes to compliance with the GDPR. Online Travel Agents and Payment Processing Companies have their own compliance policies and structures. the EHL staff complement comprises two owner-partners (JB / FD) and one part-time administrator (DT). The role of *Controller* as defined by the Information Commissioner’s Office (ICO) will be subsumed in the duties of the partners and administrator as allocated in the table below.

4.2]

Responsibilities	Lead & implementation
<ul style="list-style-type: none"> ● Keeping updated about data protection issues, risks and responsibilities. Ensuring EHL has systems & data management processes in place to achieve compliance. 	FD Partner with DT Administrator.
<ul style="list-style-type: none"> ● Documenting, maintaining and developing the organisation’s data protection policy and related procedures, in line with planned schedule 	FD partner, DT Administrator.
<ul style="list-style-type: none"> ● Embedding ongoing privacy measures into organisational policies and day-to-day activities involving processing personal data. The policies themselves will stand as proof of compliance. 	FD partner, DT Administrator.

<ul style="list-style-type: none"> ● Arranging training and advice for staff 	FD partner
<ul style="list-style-type: none"> ● Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters 	JB partner, DT Administrator
<ul style="list-style-type: none"> ● Checking and approving contracts or agreements with third parties that may handle the company's sensitive data 	Partners
<ul style="list-style-type: none"> ● Ensuring all systems, services and equipment used for storing data meet acceptable security standards. 	Partners
<ul style="list-style-type: none"> ● Performing regular checks and scans to ensure security hardware and software is functioning properly 	Partners utilising third party expertise.
<ul style="list-style-type: none"> ● Evaluating any third party services the company is considering using to store or process data, to ensure their compliance with obligations under the regulations 	Partners utilising third party expertise and manufacturer/software warranties
<ul style="list-style-type: none"> ● Developing privacy notices to reflect lawful basis for fair processing, ensuring that intended uses are clearly articulated, and that data subjects understand how they can give or withdraw consent, or else otherwise exercise their rights in relation to the companies use of their data 	Partners