

## DATA COVERED BY THIS PRIVACY STATEMENT

This Privacy Statement describes the privacy practices of the Clarington Limited T/A Hotel Halvard for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, including halvard.co.uk;
- through the software applications made available by us for use on or through computers and mobile devices (the **Apps**);
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our **Social Media Pages**);
- through email messages that we send you that link to this Privacy Statement and through your communications with us online or in person;
- from third parties such as **Authorized Licensees, Owners and Franchisees**, and Other Sources, such as public databases, marketing partners, and other third parties; and
- when you visit or stay as a guest at one of our properties - **Property Visits and Offline Interactions**.

Collectively, we refer to the **Websites**, the **Apps**, and our **Social Media Pages**, as the “**Online Services**” and, together with the **Property Visits and Offline Interactions**, the “**Services**.”

## THE DATA WE COLLECT

At touchpoints throughout your guest journey, we collect Personal Data in accordance with the law, and to provide you with exemplary services. **Personal Data** is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Financial information (such as credit and debit card number or other payment data)
- Language preference
- Date and place of birth
- Nationality, passport, visa, or other government-issued identification data
- Important dates: birthdays, anniversaries, and special occasions
- Membership or loyalty program data (including co-branded payment cards, travel partner program affiliations)
- Employer details (for business-related bookings)

- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media account to our social media account

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Biometric data
- Images, video and audio data via: (a) security cameras located in public areas, such as reception rooms and corridors, in our properties; and (b) body-worn cameras carried by our personnel

We may also collect information about your "**Stay Preferences**" that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your "**Personal Preferences**," that may include details of your special anniversaries (such as your birthday or wedding anniversary), what type of activities you prefer to take part in when staying with us, and your hobbies. Personal Preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

#### **THE ONLINE AND MOBILE DATA WE COLLECT**

Typically, we do not collect Personal Data through your use of the Online Services. However, we may collect "**Other Data**" that does not directly identify you. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data.

"Other Data" includes:

**System Data:** When you use both desktop and mobile devices to access the Online Services, we collect certain data through your browser or automatically through your device, such as your computer type, screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services you are using.

**IP Address and Mac Address:** We also collect your IP address, a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.

### **Cookies and Similar Technologies on our Websites:**

When you visit our Websites from either a desktop or mobile device, we may collect and use cookies or other identifiers to serve you with personal advertisements for Clarington Limited T/A Hotel Halvard and third party products, either via email, on our website, or on other websites on the Internet; to measure how you interact with our Websites; and to maintain your preferences. We do this primarily through cookies, which are pieces of data stored directly on the computer or mobile device that you are using.

You can learn more about cookies at: <https://allaboutcookies.org/how-to-manage-cookies>

In general, we use three different types of cookies:

- **Strictly Necessary Cookies:** These cookies are necessary to enable the basic features of the website or app, such as providing a secure log-in.
- **Functional Cookies:** These cookies allow our websites to remember your site preferences and choices you make on the site. We also use functional cookies to facilitate navigation, to display content more effectively, and or to personalize your experience.
- **Analytics Cookies:** Analytics cookies help us improve our website by collecting and reporting information on how you use it.

### **Opting Out of Cookies**

There are several ways to opt-out of cookies. If, however, you do not accept any cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests.

Clarington Limited T/A Hotel Halvard and Halvard Apartments recognizes the Global Privacy Control.

1. **Browser settings:** You can opt out of cookies on your browser. Every browser is different so please check the instructions provided by your browser.

2. Through our “**Tracking Preferences**” site.

3. **Analytics and Data:** We collect data through the Microsoft 365 platform; GoDaddy.com hosting service; Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyse data about use of the Online Services. These services also collect data regarding the use of other websites, apps, and online resources. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>

### **Advertising Choices**

We may use third-party advertising companies to serve advertisements on our Websites, Apps, and other websites including Facebook , Instagram and Twitter regarding both Clarington Limited T/A Hotel Halvard and third-party goods and services that may interest you when you access and use the Online Services or other websites or online services.

To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit

<http://www.networkadvertising.org/managing/optout.asp>

and

<http://www.aboutads.info/>,

<http://www.youronlinechoices.eu> or

<https://legal.yahoo.com/xw/en/yahoo/privacy/optout/index.html>

For the advertisements you see on Clarington Limited T/A Hotel Halvard Online Services, you can also opt-out

- directly in the ad by clicking on the AdChoices icon;
- by opting out of Advertising Cookies in **Tracking Preferences**;

### **Aggregated and Segmented Data.**

We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both Personal Data and Other Data to divide customers into segments, or groups, in order to provide more relevant advertising, including third party advertising.

### **HOW AND WHERE WE COLLECT YOUR DATA**

This Privacy Statement describes the privacy practices of the Clarington Limited T/A Hotel Halvard for Personal and Other Data that we collect through the following:

- **Clarington Limited T/A Hotel Halvard, Halvard Apartments.** We collect Personal Data and from both Hotel Halvard and Halvard Apartments for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating loyalty programs and to accomplish our business purposes.
- **On-Property and Service Providers.** We may collect your Personal Data and Other Data from restaurant, concierge, bar and other outlets at our properties.
- **Promotional Activity.** We collect Personal Data and Other Data from with third parties such as Facebook and Instagram who may provide promotions to you, contests, or other offers.
- If you are an employee of a company that has an account with Clarington Limited T/A Hotel Halvard and Halvard Apartments and pay for your expenses using a corporate credit card, we may collect Personal Data and Other Data related to your stay or employment. This Privacy Statement does not apply to the handling of your Personal Data by your employer, credit card company or bank, and we are not responsible for their practices.
- **Other Sources & Service Providers.** We collect Personal Data and Other Data from various third parties, such as public databases, joint marketing partners, and online travel agencies such as Booking.com; Expedia; hotels.com etc (OTAs).
- **Online Services.** We collect Personal or Other Data when you interact with our Online Services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our Websites, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.

- **Telephonic; email and online or website reservations and requests or queries.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, or via online chat services such as Facebook Messenger; Twitter or WhatsApp. These communications may be recorded for purposes of quality assurance and training.
- **Internet-Connected Devices.** We collect Personal and Other Data from internet-connected devices available in our properties. Such data is limited to the Mac address of the device that you are using to connect to the hotel's public internet connection as well as such other information that our public wi-fi system may from time to time require from your device in order to maintain your connection to the network.

#### WHY WE COLLECT YOUR DATA (LEGAL BASIS)

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Booking & Guest Registration	There are a number of activities associated with this purpose, such as: facilitating reservations and bookings of hotel accommodations and related services; engaging in pre-arrival communications (logistics, changes, preferences, etc.); and processing payments and security deposits.	<p>Performance of contract for the individual with the guest booking the room</p> <p>Legitimate interests for the individual booking the room, for example, honouring his/her preferences, as well as for any individuals accompanying the primary guest (e.g., spouse, children, friends)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
On-Site Reception & Stay Services	There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services (based on past usage or expressed preferences);	<p>Performance of contract, such as processing payments</p> <p>Legitimate interests, such as honouring the guest's preferences (e.g., for a room near the elevator or on a top floor)</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Conferences & Events	<p>providing concierge and luggage storage; making arrangements with third-party providers on behalf of guests (such as coordinating tours and other sightseeing excursions; arranging taxi, shuttle and chauffeur services; and facilitating reservations and bookings at restaurants and events); administering and facilitating access to Wi-Fi, TV and other connectivity services (including access to business center amenities, such as printing and photocopying services) and entertainment systems (such as music players); facilitating in-room dining (including taking into account any dietary, health restrictions or other personal needs expressed by the guest); housekeeping services (including preferences for special pillows, duvets and other amenities expressed by the guest) and dry-cleaning services; handling customer requests, inquiries and complaints; and determining eligibility for age-restricted goods and services (such as alcohol).</p> <p>There are a number of activities associated with this purpose, such as: communicating with customers about conferences and other event planning (“Events”); facilitating reservation and bookings of</p>	<p>Consent, such as collecting information regarding dietary preferences that the guest chooses to provide</p> <p>Legal obligations, such as collecting national ID numbers where legally required</p> <p>Performance of contract, such as collecting information regarding a planned Event</p> <p>Legitimate interests, such as responding to customer</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Clarington Limited T/A Hotel Halvard Operations & General Business	<p>Events; engaging in pre Event communications (logistics, accommodations, changes, etc.); preparing for and coordinating Events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; performing credit checks; handling customer requests, inquiries and complaints; and communicating with participants during Events.</p>	<p>complaints or concerns relating to an Event</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
	<p>There are a number of activities associated with this purpose, such as: administering customer-care services to facilitate and address inquiries, comments and complaints about any of our services (such as in person, through phone lines, email, or on social media); handling security and fraud prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and the hosting of data); monitoring and analysing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, carrying out pilot programs for potential new services and both developing new and improving existing</p>	<p>Performance of contract, such as ensuring that online services are functioning so that individuals can make reservations or manage loyalty accounts</p> <p>Legitimate interests, such as responding to customer complaints and concerns which may include, where applicable law permits, recording customer service calls</p> <p>Consent, such as for marketing programs</p> <p>Legal obligations relating to financial transactions, such as the obligation to</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	<p>services; and facilitating changes to our business model and other reorganizations such as the addition of further accommodation properties to our portfolio of managed properties and restructurings of our business (including prospective transactions).</p>	<p>maintain books and records</p>
<p>Emergency &amp; Incident Response</p>	<p>There are a number of activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies (including facilitating medical services); actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).</p>	<p>Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel</p> <p>Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel</p> <p>Legal obligations, such as documenting on-site accidents</p> <p>Individuals' vital interests, such as contacting medical or emergency services for an ill guest</p>
<p>Legal &amp; Compliance</p>	<p>There are a number of activities associated with this purpose, such as: complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting national security or law</p>	<p>Legal obligations, such as complying with legal processes</p> <p>Legitimate interests, such as enforcing terms and conditions to protect trademarks</p>



PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Spa, Beauty, Golf, & Fitness Services	<p>enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of the Clarington Limited T/A Hotel Halvard, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that Clarington Limited T/A Hotel Halvard may sustain.</p> <p>There are a number of activities associated with this purpose, such as: facilitating reservations and bookings; determining eligibility for services; honouring disability or other health-related restrictions and providing appropriate and safe activities and services; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging requested professionals for specific treatments and services; and handling customer requests, inquiries and complaints.</p>	<p>Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents involving guests</p> <p>Performance of contract, such as processing payments</p> <p>Consent, such as collecting information about back problems when providing massage services</p> <p>Legitimate interests, such as providing personalized services (e.g., offering golfing opportunities based on past activity)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests (e.g., when an individual becomes ill while using the fitness equipment)</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Food & Beverage Services	<p>There are a number of activities associated with this purpose, such as: facilitating reservations; honouring dietary preferences; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging reservations; and handling customer requests, inquiries, and complaints.</p>	<p>Performance of contract, such as processing payments</p> <p>Consent, such as collecting information about dietary, health restrictions, or personal needs of a guest when ordering food</p> <p>Legitimate interests, such as providing personalized services (e.g., offering red wine to a guest based on previous requests)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests (e.g., when an individual becomes ill in one of the restaurants)</p>
Child-Related Services (for Parents & Legal Guardians)	<p>There are a number of activities associated with this purpose, such as: facilitating babysitting/hotel nanny, facilitating reservations and bookings; preparing for and coordinating hotel accommodations and services in accordance with guest preferences, instructions and expectations; payment and billing services; dining services</p>	<p>Performance of contract, such as having a child of a certain age stay in the room with his/her parents may amount to extra charges or discounts</p> <p>Consent of parent or legal guardian, such as accommodating needs of children</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	(for example, special menus for children).	<p>Legitimate interests, such as providing a crib or child-sized bathrobes and other amenities for children</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests,</p>
Loyalty Programs, Accounts, & Relationship Management	<p>There are a number of activities associated with this purpose, such as: registering users in loyalty and other client account programs and discount card programs such as finest.im; determining eligibility for various programs and related services; administering loyalty programs; providing consistent and personalized service based on past usage and the preferences expressed by members; ensuring access to Online Services; processing payments; notifying members about changes to programs, terms and conditions; and handling members' requests, inquiries and complaints.</p>	<p>Performance of contract, such as assessing points and distributing benefits</p> <p>Consent, such as honoring the mode of communication preferences (e.g., email, SMS)</p> <p>Legitimate interests, such as managing members' choices regarding how they wish to earn, track, and use points</p> <p>Legal obligations relating to financial transactions such as the obligation to maintain books and records</p>
Marketing, Promotions, Contests & Third Party Products	<p>There are a number of activities associated with this purpose, such as: communicating about products and services that may</p>	<p>Performance of a contract, such as fulfilling obligations associated with a contest</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	<p>be of interest to guests; providing personalized advertisements for products and services on selected websites; facilitating participation in contests and other promotions such as photos and posts on social media; and handling customer requests, inquiries and complaints.</p>	<p>Consent, such as honoring the mode of communication preferences (e.g., email, SMS)</p> <p>Legitimate interests, such as providing advertisements for similar products and services</p> <p>Legal obligations, such as handling information consistent with rules relating to sweepstakes</p>

**MORE INFORMATION ABOUT YOUR PERSONAL PREFERENCES**

Our goal is to serve you better and meet your expectations and preferred level of hospitality at each stage, from the moment that you book with us through to when you check out. See below to learn more.

PERSONAL PREFERENCES	PURPOSES	LEGAL BASES
Anniversaries	<p>When you stay with us, we want to help you celebrate any special occasion, such as an anniversary, birthday. For example, we may make a note of these dates to allow us to provide you with a birthday or anniversary gift.</p>	Consent, where applicable
<p>Activity type and hobbies (such as hiking trips, babysitting, sightseeing, travel and transportation details, restaurant etc.)</p>	<p>We want to ensure that we provide you with services that enhance your Hotel Halvard or Halvard Apartments experience. To do this, we may retain your preferences about the types of activities that you like to take part in, so that we can ensure we are able to offer</p>	Consent, where applicable

PERSONAL PREFERENCES	PURPOSES	LEGAL BASES
	you similar experiences when you stay with us in the future.	
Relationships (husband, wife, son, daughter, etc.)	We understand that your Preferences may change depending on who you are traveling with such as your preferred room type. We may keep a record of your relationships to assist us with making your Hotel Halvard or Halvard Apartments stay as comfortable as possible. For example, if we know you are traveling with small children, we can proactively plan for additional accommodations such as a crib or roll-away bed.	Legitimate interest, in order to provide you with exceptional service  Consent, where applicable
Preferences for properties and facilities	When you are staying with us, we want to make sure that we can provide you with services to enhance your Hotel Halvard or Halvard Apartments experience. To do this, we may retain your preferences for our properties and facilities, based on your past stay preferences, nanny services, spa and beauty services, restaurant, and excursions .	Legitimate interest, in order to provide you with exceptional service  Consent, where applicable
Dietary preferences	When you stay with us, we want to ensure that you are safe, that we are looking after your wellbeing, and to provide you with services to enhance your Clarington Limited T/A Hotel Halvard experience. For example, we may make a note of your dining or beverage preferences so that we are prepared if you request room service or dine at our restaurant or bar lounge.	Legitimate interest, in order to provide you with exceptional service  Consent, where applicable

#### HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share Personal Data and Other Data with the following:

- **Clarington Limited T/A Hotel Halvard & Halvard Apartments.** We disclose Personal Data and Other Data to other properties within the Clarington Limited T/A Hotel Halvard and Halvard Apartments for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes. We share your Personal Data and Other Data used for making reservations with the applicable property and Clarington Limited T/A Hotel Halvard & Halvard Apartments to fulfil and complete your reservation.
- **Owners:** We disclose Personal Data and Other Data to managers of Halvard branded properties (Hotel Halvard and Halvard Apartments) for the purposes described in this Global Privacy Statement.
- **On-Property and/or Travel Providers.** We may share your information with the restaurant, bar, concierge and other departments at our properties to provide you with services.
- **Online reservations platform and agents.** We work with certain third parties that allow you to make reservations online for accommodation and services provided by us. For example, certain companies and organizations accept online bookings which are then forwarded to our third party managed channel manager and ultimately appear on our reservations system. When you make a reservation through an agent; through our website, or directly in person or over the phone or by email communication, personal information about you pertaining to your reservation will be stored on a cloud based third party channel manager reservations system – namely freeonlinebooking.com. Data shared in this way will be governed by the third party’s privacy policy and not this Privacy Statement.
- **Service Providers.** We disclose Personal Data and Other Data to third party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services. Data shared in this way will be governed by the third party’s privacy policy and not this Privacy Statement.

**Other Uses and Disclosures:**

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations, such as in the event of any reorganization, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Clarington Limited T/A Hotel Halvard & Halvard Apartments business, assets or stock (including any bankruptcy or similar proceedings); (f) to protect the rights, privacy, safety or property of the Clarington Limited T/A Hotel Halvard and Halvard Apartments, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law.

**YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS**

Clarington Limited T/A Hotel Halvard & Halvard Apartments, believe that you should have choices with respect to your data. We provide you with the options, information, and choices below to

express your preferences: what and how much you share with us and when and how you hear from us.

### **Communication Preferences**

- To change how we or our partners communicate with you, please email or call us directly on +44 (0)1624 844040
- If you want to amend or correct any information that we have about you, please email us at [corporate@halvard.co.uk](mailto:corporate@halvard.co.uk) or call us on +44 (0)1624 844040.

### **Cookies and Other Data**

Please note that cookies are used only to facilitate the proper operation of our website. Please do not allow cookies if you are not comfortable with these when using our website.

### **Individual Rights**

#### **How You Can Request to Access, Change, Delete, Restrict or Confirm the Use or Object to the Processing of Your Personal Data**

- If you or your authorized agent would like to request to access, change, delete, restrict or confirm the use or object to the processing of your Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data please email us at [corporate@halvard.co.uk](mailto:corporate@halvard.co.uk) or call us on +44 (0)1624 844040.

For your protection, we only fulfil requests for the Personal Data associated with the email address that you identify in your request, and we may need to verify your identity before fulfilling certain requests. When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request.

Clarington Limited T/A Hotel Halvard and Halvard Apartments acknowledges and respects our guests' privacy and we will try to comply with your request as soon as reasonably practicable and consistent with applicable law.

### **OTHER IMPORTANT PROVISIONS**

#### **Non-Clarington Limited T/A Hotel Halvard & Halvard Apartments**

This Privacy Statement does not address, and we are not responsible for the privacy, data, or other practices of any entities outside of Clarington Limited T/A Hotel Halvard and Halvard Apartments, including Strategic Business Partners, or any third party operating any site or service to which the Services link, payment service, loyalty program, the high-speed Internet providers at our properties such as Manx Telecom. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We generally have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, WhatsApp or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our social media pages.

## **Security**

- We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us by email at [corporate@halvard.co.uk](mailto:corporate@halvard.co.uk) or call us on +44 (0)1624 844040.

## **Retention**

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services).
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)

## **Sensitive Data**

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data *e.g.*, passport number, taxpayer identification number, national identity number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records (unless required by law as in the case where a person is the subject of an on-licence alcohol banning), or information on other judicial or administrative proceedings.

## **Use of Services by Minors**

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.

## **International Data Transfers**

Because Clarington Limited T/A Hotel Halvard and Halvard Apartments operates two boutique accommodation properties on the Isle of Man in a global environment, with third party agents and online booking platforms based in various countries around the world, transferring data internationally is essential to our business; payment; marketing and reservations infrastructure. As a result, we will, subject to law, transfer personal and other data collected in connection with reservations and the services we provide, to entities in countries where data protection standards



may differ from those in the country where you reside, including outside the EEA, UK, or Switzerland. By making a reservation, visiting, or staying at Hotel Halvard Hotel and/or Halvard Apartments or using any Halvard Hotel or Halvard Apartments service, you understand that we transfer your Personal Data globally.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Data.

Some of the countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en))

## **CONTACT US**

If you have any questions about this Privacy Statement, please contact us at [corporate@halvard.co.uk](mailto:corporate@halvard.co.uk)

The data controller responsible for your personal data is Clarington Limited T/A Hotel HalvardHotel and Halvard Apartments:

Clarington Limited  
57-58 Loch promenade

Douglas

IM1 2NA

Isle of Man

## **Additional Information**

- To lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection laws occurs. For the EEA, a list of the national data protection authorities can be found at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080). For the UK, the responsible data protection authority is the Information Commissioner's Office (ICO), more details about which can be found at [www.ico.org.uk](http://www.ico.org.uk) and for the Isle of Man please see [inforights.im](http://inforights.im)