



LENSFIELD  
HOTEL  
CAMBRIDGE

## **PRIVACY POLICY**

**This privacy statement strictly and only applies to our site:  
[www.lensfieldhotel.co.uk](http://www.lensfieldhotel.co.uk).**

**The Lensfield Hotel is committed to protecting and respecting your privacy, and therefore, we safeguard information we receive from visitors who interact with our website directly or indirectly. We maintain physical, electronic, and procedural safeguards to guard your information.**

**The Lensfield Hotel also complies fully with the Data Protection Act of 1998 ([www.dataprotection.gov.uk](http://www.dataprotection.gov.uk)) and is dedicated to ensure that any data you provide is dealt and treated accordingly.**

**The General Data Protection Regulation (also known as: “GDPR”), which will apply from 25<sup>TH</sup> MAY 2018, creates consistent data protection rules across Europe. We have therefore updated our Privacy Policy to ensure we are GDPR compliant.**

### **THE LENSFIELD HOTEL COMPANY LTD (“We”) IS COMMITTED TO PROTECTING & RESPECTING OUR CUSTOMER’S PRIVACY**

This policy (together with our terms of use; [www.lensfieldhotel.co.uk](http://www.lensfieldhotel.co.uk) and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **This Policy sets out the following:**

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, mobile applications and online services;
  - Where we obtain the data from;
  - What we do with that data;
  - How we store the data;
  - who we transfer/disclose that data to;
  - How we deal with your data protection rights;
- And how we comply with the data protection rules.
- All personal data is collected and processed in accordance with UK and EU data protection laws.

### **What do we use your personal data for?**

Your data may be used for the following purposes:

- a. Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to your stay at LH and for Spa treatments at THE BOUTIQUE WELLNESS SPA.
- b. Contacting you in the event of a change or cancellation: we send you communications about the services you have asked for and any changes to such services. These communications are not made for marketing purposes and cannot be opted-out of;
- c. Credit or other payment card verification/screening: we use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;
- d. Administrative or legal purposes: we use your data for statistical and marketing analysis, systems testing, customer surveys, maintenance and development, or in order to deal with a dispute or claim. By providing any personal data you explicitly agree that we may use it to perform profiling activities in accordance with this Privacy Policy;
- e. Immigration/customs control safety: we may be obliged to provide your information to border control agencies;
- f. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;

- g. Customer Services communications: we use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
- h. Provide tailored services: we use your data to provide information we believe is of interest to you, prior to, during, and after your STAY with us and to personalise the services we offer to you, such as special offers
  - i. Marketing: from time to time we will contact you with information regarding in house promotions via e-communications. You will have the choice to **opt in or opt out** of receiving such communications by indicating your choice at the booking stage. You will also be given the opportunity on every e-communication that we send you to indicate that you no longer wish to receive our direct marketing material.
  - j. We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for.
  - k. Only children aged 16 or over can provide their own consent.
- l. We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.
- m. When we no longer need your personal data, we will securely delete or destroy it.

### **What personal data we collect:**

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, booking reference number, payment details and information about your access to our website.

We may collect personal data from you when you book our Hotel or Spa (either directly or indirectly through our trusted third party partners), use our website and other websites accessible through our website and / or App, participate in a survey or competition, or when you contact us.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, passport or other recognized personal ID card numbers and details, credit/debit card or other payment details;
- b. Advance Personal Information, which includes your name, nationality, date of birth, gender, passport or ID number, expiry date and country of issue;
- c. Medical conditions for customers using the Spa who have special medical requirements and/Hotel customers with dietary requirements;
- d. Information about your use of our website and/or App;
- e. The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.
- f. Location, including real-time geographic location of your computer or device through GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell locations, if you use location-based features and turn on the Location Services settings on your device and computer.

Personal details about your physical or mental health, alleged commission or conviction of criminal offences are considered “sensitive” personal data under applicable data protection laws. We will process any such data only if you have given your explicit consent, or it is necessary (for instance if you request special assistance), or you have deliberately made it public.

### **Sharing your personal data**

Your personal data may be shared with third parties for the purpose described in this Privacy Policy:

- a. Government authorities, law enforcement bodies, on line agents through which you book your reservation with;
- b. Credit and debit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment;
- c. Legal and other professional advisers, law courts and law enforcement bodies in all countries.
- d. Social media: You may be able to access third party social media services through our website before coming to our website. When you are registered with your social service account, we will obtain the personal information you choose to share with us through these social media services pursuant to

their privacy settings in order to improve and personalize your use of our website. We may also use social media plugins on our website. As a result your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the privacy policy of these third-party social media providers to find out more about these practices.

### **Your Data Protection Rights**

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

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **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** of 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.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- **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 transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **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. 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.

### **Security of your personal data and how it is stored**

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line EU law on data protection rules.

***Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.***

