

## LANSBURY HERITAGE HOTEL PRIVACY STATEMENT

The Lansbury Heritage Hotel values you as our guest and recognises that privacy is important to you. We want you to be familiar with how we collect and use your data.

This Privacy Statement describes the privacy practices of the Lansbury Heritage Hotel for personal data that we collect:

- through third party websites in case you do not make a booking directly with us;
- through our social media pages that we control;
- through email messages that we send you and through your communications with us;
- when you visit or stay as a guest at one of our properties, or through other offline interactions.

### **What data we collect**

“Personal Data” are data that identify you as an individual or relate to an identifiable individual.

We collect Personal Data in accordance with law, including your name, gender, postal address, telephone number, email address, credit and debit card number or other payment data, language preference, nationality, passport, visa or other government-issued identification data, important dates, such as birthdays, anniversaries and special occasions, 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 and loyalty accounts, images and video data via security cameras located in public areas, such as hallways and lobbies, in our property.

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.

### **How We Collect Personal Data**

- directly from individuals when you make a reservation over the phone or communicate with us by email, communicate with us, or otherwise connect with us or post to social media pages or when you visit our property or use on-property services and outlets, such as restaurant and spa;
- from individuals’ agents, such as assistants and corporate travel coordinators also from third party vendors or business partners, such as travel agencies and data providers.

### **How we use Personal Data**

In some instances, we will request that you provide Personal Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We use Personal Data and Other Data for our legitimate business interests in order to provide services you request including the following:

- To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with meetings events and to provide you with other information about the area and the property which you would like to visit.
- To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service.
- To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the front desk.
- We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.
- Business Purposes. We use Personal Data for data analysis, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

#### **When we disclosure Personal and Other Data**

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; (f) to protect the rights, privacy, safety or property of the Lansbury Heritage Hotel, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of the Lansbury Heritage Hotel, including payment service.

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, RIM 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.

We will not send you direct marketing emails or correspondence. However, we will require your email address to send you important administrative messages, from which you cannot opt out.

### **How You Can Access, Change or Suppress Your Personal Data**

If you would like to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by law), you can contact us at [info@lansburyhotel.com](mailto:info@lansburyhotel.com) or by mail:

Lansbury Heritage Hotel

117 Poplar High Street

E14 0AE

London

Also, to remove the information stored electronically in our Property Management System, you may submit a request to the software provider directly on [www.mews.li/navigator](http://www.mews.li/navigator).

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfill requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase, reservation, or promotion). There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

### **Retention**

We will retain your Personal Data for the period necessary to fulfill 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., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

### **Cross-Border Transfer**

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

### **Contacting Us**

If you have any questions about this Privacy Statement, please contact us at [info@ansburyhotel.com](mailto:info@ansburyhotel.com) or by mail:

Lansbury Heritage Hotel  
117 Poplar High Street  
E14 0AE  
London