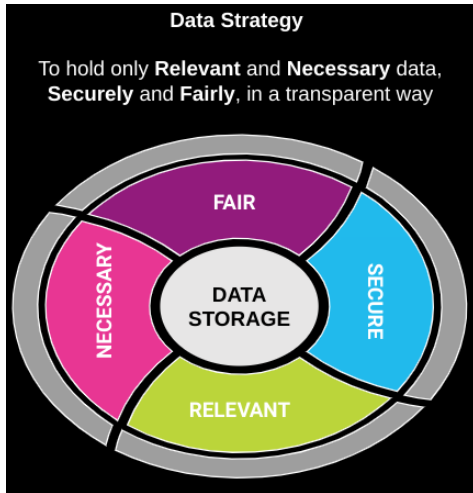


Data Strategy

All data at Village Hotels is held in accordance with our data strategy.



Purpose of Right to be Forgotten Requests

With the introduction of GDPR Regulation & Data Protection Act 2018, data subjects (guests, members etc) have more individual rights. One of these rights is the 'Right to Erasure' also commonly known as the 'Right to be Forgotten'

Individuals have the right to have their personal data erased if:

- the personal data is no longer necessary for the purpose in which it was originally collected or processed it for;
- we are relying on legitimate interests as our basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest for us to continue the processing;
- we are processing the personal data for direct marketing purposes and the individual objects to that processing;

The right is not absolute and only applies in certain circumstances. In our context the right to erasure does not apply if processing of the data is required to comply with a legal obligation.

How long do we have to complete the request?

We have to respond within 30 days and ensure that the data is 'beyond use' (eg data can't be searched for) . We have to confirm to the data subject if the data has been removed and from what locations.

Procedure

An individual can email dataprotection@village-hotels.com with the subject line of Right to be Forgotten to request their data is removed from all systems.

Data Protection will contact all the relevant suppliers and system support specialists to request erasure and respond directly to the guest.

