

## **Introduction**

Your privacy is important to us, and we are committed to protecting your personal data.

This policy shows you how we use your personal data when you interact with us, when we welcome you as our guest and when you visit our website.

If you have any questions, please see how to contact us about privacy below.

## **How we collect your data?**

We collect and receive data in different ways. Here is an explanation of how we do it.

When you are a guest at any of our hotels you may give us data in person when you:

- check-in and check-out
- give us your business card
- make use of our accommodation, facilities and services including out-sourced and 3<sup>rd</sup> party services
- attend our events
- interact with our staff and other guests
- Log in to our wireless network

You may give us data when you interact with us remotely via this website, by post, phone or email, or through chat or social media when you:

- sign up to receive our newsletter or other direct marketing
- make enquiries or request information, or correspond with us
- book accommodation, hospitality services or spa treatments
- engage with us on social media
- register for Prestige Club

We may get some data automatically when you interact with us:

- by accessing this website and the address of a referring website, if any
- from technology partners who help us run our mailing list sign-ups
- by accessing wireless services at any of our facilities
- from providers of payment

- from analytics providers
- from feedback partners

### **The personal data we may collect from you**

Some of the data collected, as explained above, may be personal data. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) below shows the type of personal data we collect that depends on how you interact with us.

- **Identity Data** - includes title, first name, middle name, last name, identification documents such as national ID or passport number, nationality, gender, date of birth, images, videos and audio via security cameras in public areas within our properties, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media username.
- **Contact Data** - includes mailing address, email address and telephone numbers.
- **Profile Data** - includes your username and encrypted password, your interests / preferences, feedback responses, as well as any data which we have added (for example, using analytics).
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, platform, and other technology on the devices you use to access this website.
- **Usage Data** - includes information about how you use our website, products, and services.
- **Tracking Data** - includes information we collect about you from cookies.
- **Marketing and Communications Data** - includes your preferences in receiving direct marketing materials from us.
- **Sensitive personal data** – includes but is not limited to marital status, health, family details including (names of your children, parents, spouse or spouses), sex or sexual orientation, health status, race and financial information and transaction data.

Kindly note, if you choose not to share certain personal data with us, we might not be able to provide the products and services you have asked for.

### **Information collection in relation to children**

We collect a variety of personal data about our guests and visitors at our various properties and on the website. As our website is not intended for children, we do not knowingly collect data relating to children.

If you are under 16 and would like to use our website, please ask a parent or guardian for assistance.

**We would however like parents and guardians to be informed that their children's images may be captured via our security cameras at our various properties.**

### **How we use your personal information**

We will use your personal information in the following circumstances:

- To enter into a contract with you. For example, when you check-in at one of our properties, that is a contract.
- To comply with a legal obligation. For example, keeping records for tax returns.
- When we have consent from you to receive direct marketing materials from us.
- To request your evaluation of your stay with us.
- To ensure safety of all our personnel and guests staying in our properties.
- To respond to your customer-service enquiries or requests.
- To enhance our services through analysis of collected data and feedback.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

The Serena Hotels app may collect user uploaded images such as your identification card when using the app's Mobile Check-In feature to check-in to the hotel.

To read more on our Privacy Policy, please download the full document from the link below.