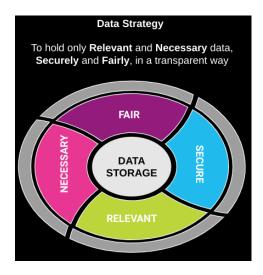


Data Strategy

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



Subject Access Requests from individuals

Purpose

The purpose of this statement is to give all individuals an understanding of Subject Access Requests and Village Hotels responsibility to deal with Subject Access Requests within the timeframe given by the UK GDPR.

Policy

What is a Data Subject Access Request?

A subject access request (SAR) is simply a request made by or on behalf of an individual for the information about them. The GDPR entitles all individuals to make requests for their own personal data.

The request does not have to be in any particular form other than in writing, nor does it have to include the words 'subject access'.

If a verbal request for information is received we may ask the data subject to put the request in writing, or to complete the appropriate 'Subject Access Request Form'.

There is a requirement to confirm the individual's identity to ensure the requested information is passed to the correct individual. Forms of required ID are set-up in the 'Subject Access Request Form'

The applicant will be informed of how the application is being dealt

Internal employee data subject access requests will be treated as being of equal importance to external data subject access requests.

How to make a Subject Access Request

All data subject access requests will be managed by the data protection team, ideally via e-mail to dataprotection@village-hotels.com for processing as soon as possible.

A response will be given within 30 days.

We cannot accept a verbal Subject Access Request, if any request is given verbally the requester must be asked to complete the application in writing, or be provided with a blank copy of the 'Subject Access Request Form'. There is a form for Subject Access Requests from guests and a separate form if the request is from an employee.

Responding to a Data Subject Access Request

It is the Legal Assistant's responsibility, with assistance from the General Counsel or Compliance Officer to respond to a data subject access request. Village Team Members will not send a direct response without the approval of the Legal Team.

Data subject access requests will be complied with promptly, and in any event, within 30 days of the receipt of the request.

We are entitled to ask the data subject for further information to help us find the data requested. For example, we could ask for the dates an employee was employed by us or at which site they worked. The 30 day period does not start until this additional information is received.

In responding to data subject access requests we are required to ensure information relating to an individual, other than the data subject who is making the request, is not disclosed unless: i. the other individual has consented to such disclosure, in which case written proof of this should be obtained and kept; or ii. it is reasonable in all the circumstances to comply with such a request without any consent. This may be the case if the information is already available to the public, for example.

In considering whether it is reasonable to comply with the request, we will consider:

- i. any confidentiality owed to the other individual;
- ii. the steps taken to get consent;
- iii. if the individual concerned can give consent; and
- iv. any express refusal by such individuals to give consent.

A subject access request entitles the data subject to information which contains their personal data. It does not entitle the data subject to all word documents, e-mails etc which they were copied in on, or which relate to work or projects they were involved in.