

## PRIVACY NOTICE: HOTEL, RESTAURANT & WEDDINGS/EVENTS

This notice tells you what we do with your personal information. This includes what you tell us about yourself, what we learn by having you as guest in our hotel and restaurant, the choices you make about the marketing you ask us to send. It also explains how the law protects you, how we use your data and what your privacy rights are. We update this notice regularly in accordance with changes in privacy law (*updated Apr 2018*).

## WHO WE ARE



### THE BEDFORD ESTATES

The Bedford Estates is the generic name under which the following businesses operate, collectively referred to as 'The Bedford Estates, 'we' or 'us' in this policy. The following businesses are part of Woburn Enterprises Partnership (our leisure businesses in Woburn, Bedfordshire). The partnership is managed by Woburn Enterprises Limited, The Bedford Office, Woburn, Milton Keynes, Bedfordshire, MK17 9PQ (company no. 00966094; ICO registration ZA307399) and responsibility for your personal data sits with it. Full privacy notice: [www.woburn.co.uk/privacy](http://www.woburn.co.uk/privacy)



[www.thewoburnhotel.co.uk](http://www.thewoburnhotel.co.uk)



[www.sculpturegallerywoburn.co.uk](http://www.sculpturegallerywoburn.co.uk)



[www.woburnweddings.co.uk](http://www.woburnweddings.co.uk)

## QUESTIONS, CONCERNS & RIGHTS

In the first instance, questions about how we collect, store and use personal data or concerns about how it is managed should be directed to:

For The Woburn Hotel: [twldata@woburn.co.uk](mailto:twldata@woburn.co.uk)

For The Sculpture Gallery or Woburn Weddings: [salesdata@woburn.co.uk](mailto:salesdata@woburn.co.uk)

### Contact us to:

- Update or rectifying your personal data
- Change you marketing & contact preferences
- Object to us using your personal data

There may be legal or other official reasons why we need to keep or use your data but tell us if you think that we should not be using it.

- You would like us to transfer a copy of your data to another company.

We are working with our software providers to ensure personal data you give under contract can be made portable.

If The Woburn Hotel or The Sculpture Gallery cannot resolve the issue or you require a copy of your personal data please contact the Data Protection Co-ordinator: phone: 01525 290 333, email: [data.protection@woburn.co.uk](mailto:data.protection@woburn.co.uk) write to: Data Protection, The Bedford Estates, Bedford Office, Woburn, Milton Keynes MK17 9PQ. If we are not able to resolve the matter to your satisfaction, you can contact the regulator: ICO (Information Commissioner's Office) tel: 0303 123 1113.

## QUESTIONS, CONCERNS & RIGHTS

As well as our internal policies and procedures, your privacy is protected by law. We are permitted only to use personal information if we have an acceptable reason to do so. This includes sharing it outside The Bedford Estates. The law says we must have one or more of these reasons:

Reason	For example	What you need to know
To fulfil a <i>contract</i> we have with you	<ul style="list-style-type: none"><li>• Hiring our venue for an event</li></ul>	If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you; we may have

Reason	For example	What you need to know
	<ul style="list-style-type: none"> <li>Managing your hotel or restaurant booking</li> </ul>	to cancel that service you have with us.
When it is our <i>legal duty</i>	Meeting our obligations under H&S and other relevant legislation.	
When it is in our <i>legitimate interest</i>	When we have a business or commercial reason to use your information; such as to follow up on an event enquiry that you have actively made	Where we rely on legitimate interests, these must not unfairly go against what is right and best for you. We must also tell you what they are.
When you <i>consent</i> to it.	We only market to you if you allow us to.	You can withdraw your consent and change your communication preferences at any time without there being any impact on a contract you have with us.

Below we note the legal reason/s we rely on for using your data, outline how we share it and how long we keep it.

What we use your personal information for	Legal Reason for using your information			
	To enter into & perform a contract	To comply with legal duty	To pursue legitimate interests of our own	Your consent
<b>Venue Bookings</b>				
Processing hotel & event bookings.	X			
Processing restaurant bookings.			X	
Processing and responding to enquiries made by you to ensure you have the most accurate information, relevant to your queries.	X		X	
Manage the use of our facilities & comply with our obligations eg. health & safety; monitor the use of our property and the communal areas of the estate, to ensure the security of the estate and protect your interests and those of other member's in relation to property and prevent unauthorised access to the estate.	X	X	X	
Exercising our rights and meeting your rights set out in agreements or contracts & dealing with complaints.	X		X	
Dealing with legal disputes involving you, including accidents on the Bedford Estates.		X	X	
<b>Marketing</b>				
Notify/invite you to events we hold & special offers (e.g. via our Newsletter)			X	X
Digital usage (eg. website)				X
<b>Business Operations</b>				
Efficient and proper estate management, planning, communications, keeping records up to date, benchmarking, accounting and auditing.		X	X	
To respond to any communications you send us, incl. social media posts; let you know about any important changes to our business or policies; to review and improve the performance of our systems, processes and employees (including training).			X	

### Special Category Data

Unless we have a *legal obligation*, *legitimate interest*, *contractual requirement* (for example were this is for the purpose of a booking) or where it is in your *vital interests* i.e. where there is a threat to your life, we rely on *consent* to: use sensitive data (racial or ethnic origin, religious or philosophical beliefs, trade union membership, genetic and biometric data, health data including gender); criminal data, & children's data.

Who we share your personal information with		What you should know
Within the Bedford Estates	We share your information with our employees where this is necessary eg. for administration purposes, as well as for estate management and governance.	Information shared is limited to that which is reasonably necessary for these purposes.
With third parties	<ul style="list-style-type: none"> <li>To process &amp; manage bookings.</li> </ul>	Where we share your data with third parties and we have a contract in place

Who we share your personal information with		What you should know
(trusted partners)	<ul style="list-style-type: none"> <li>To deliver outsourced services such as: companies providing transaction services, debt and tracing agencies, web hosting &amp; delivery of mailshots &amp; confidential waste destruction.</li> </ul> <p>We may allow software providers to access your personal information where it is necessary in order for them to provide this service. This may include preventing or addressing service or technical problems, and dealing with support issues.</p>	with them, which ensures your data is handled in accordance with the law.
Where Legally Obligated	In accordance with standing legislation, for example; The Immigration Orders (Hotel Records), 1972 requires full records to be kept of all hotel guests over the age of 16 and for these records to be open to inspection by any constable or authorised representative of the State.	We only record and retain data relevant to standing legislation.
Exceptional Circumstances	<p>Where we believe that the disclosure is:</p> <ul style="list-style-type: none"> <li>Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings and fraud prevention.</li> <li>Necessary to protect the safety of our employer, employees, yourself, our property or the public.</li> <li>Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.</li> </ul>	We are always proportionate in the data we disclose & document these disclosures.

Schedule of Personal Data		
Reason Collected	How Long We Keep Personal Data	
Hotel Bookings	1 yr (Immigration Order, 1972)	<p>The Bedford Estates has a rich archival heritage. For future research purposes which are <i>in the public interest</i> we store a limited amount of personal details permanently but please bear in mind that these records remain confidential for a period of 100 years:</p> <ul style="list-style-type: none"> <li>n/a</li> </ul>
Restaurant Bookings	1 yr (Best Practice)	
Event Enquiries	2 yrs (Business Operations)	
Contracts (incl. event bookings) & Payment Evidence	7yrs (Companies Act; Contracts)	
Complaints/Disputes	1 yr after last active contact (Best Practice)	
Marketing Preferences	Until updated (Privacy Laws)	
Surveillance eg. CCTV	28 days (Best Practice); 2yrs if required as evidence	
H&S/Accident Reports	3 yrs (Social Security Regulations, 1979)	

## How we protect your personal data

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this notice. All information you provide to us is stored securely in a physically secure environment or on our secure servers within the UK or EU. Access to your personal information will be restricted to such staff and other individuals as are necessary for the purposes for which the information was collected. We do not send data outside the EEA but if we do in future, the appropriate safeguards will be in place.