

The Swan at Streatley

PRIVACY POLICY & COOKIES

This Privacy Policy set out below, applies to the entire contents of The Swan at Streatley website under the domain name www.theswanatstreatley.com (collectively and individually the "Website") and in person using the Swan and its services and facilities including The Gym and Treatment Rooms.

This Privacy Policy and any correspondence is between "us" or "we" or "our" (**The Swan at Streatley** including **The Gym and Treatment Rooms** located at High Street, Streatley on Thames, Berkshire RG8 9HR and part of **Rare Bird Hotels**, registered office: 2nd Floor 47-57 Marylebone Lane, London, England, W1U 2NT Company number **08258851** and "you" the user of the Website and our services and facilities. "You" shall mean you and any third party that accesses the Website; someone who is not employed by us, is an individual or acting in the course of employment; that is 18 years old or older and capable of entering a contract.

We are committed to ensuring that your privacy is protected and understand the need for appropriate protection of all personal information provided by you to us. By providing us with your personal information "Data" (as defined below), whether through the Website or in person, you consent, agree and accept that we, as well as our respective representatives and/or third-party agents may collect, use, disclose and share among ourselves your personal Data as described in this Privacy Policy.

Please read this Privacy Policy carefully. By continuing to use the Website or using our services you are confirming that you accept this Privacy Policy and our Terms and Conditions. If you do not accept this Privacy Policy or Terms and Conditions, you must leave the Website and cease using our services immediately.

WHAT DATA DO WE COLLECT ABOUT YOU?

We collect data from you when you make a booking, use our facilities or our services, via our team, either in person or over the phone, and also when you book online via our Website. We also collect data when you fill in an online booking form for a treatment, gym membership application, or guest forms or by connecting using our social media websites.

Facilities include, but are not limited to The Swan Streatley hotel, The Gym and Treatment Rooms including membership, gym, treatments and guest wi-fi. We have CCTV installed in our premises in public areas and particularly around entrances and exits; this is for the purposes of prevention and detection of crime and employee monitoring.

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We also collect Data from you when you subscribe to any of our marketing communications, complete our voluntary customer surveys, enter our competitions or provide feedback. These may be carried out online, by telephone or in person. Some of the Data we collect may be classed as personal Data, that is, it is information about an individual who can be identified from it. It may be collected any time you submit it to us, whatever the reason may be.

Without limitation, any of the following "Data"; (meaning collectively all information that you submit to the Website, including but limited to, personal details and information submitted using any of our services, as provided on the Website), may be collected by us via our Website including:

Your full name

Your contact information such as email addresses and telephone/mobile numbers

Your demographic information such as preferences and interests

Your geographic information such as home address and post code (where applicable)

Your date of birth

Your IP address (automatically collected)

Your web browser type and version (automatically collected)

Your operating system (automatically collected);

Your credit or debit card details where you make a payment

A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected)

Your Cookie information (see below)

In addition, the following Data will be collected when you fill in our beauty and wellness treatment applications, membership applications or guest forms:

Your full name,

The name of your partner or spouse;

The name of your children;

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Your date of birth;

Your contact information such as email addresses and telephone/mobile numbers;

Your demographic information such as preferences and interests;

Your geographic information such as home address and post code (where applicable);

Your special dietary requirements;

Your credit or debit card details where you make a payment;

Your medical history;

Your physical health history;

Your car registration for car parking arrangements and events; and

Your passport or driving licence details

We work with Online Travel Agent Booking.com. When you enquire about or book with third parties, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy <https://www.booking.com/content/privacy.en-gb.html>

If you choose to connect with us via social media websites, for example such as Facebook or Twitter, we may collect your user name, (which may contain your name and surname) by you “liking” or “following” our page. We may also run competitions via these social media websites which will send you to a separate competition website link. By connecting with us via social media websites you are bound by their terms and conditions and privacy policies.

If you provide us with any personal Data relating to any third party (e.g. information about your spouse, children, employees or colleagues) for particular purposes, by submitting such information to us, you warrant and represent to us that you have obtained the consent of such third party to provide us with their personal Data for the respective purposes.

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HOW WE WILL USE THIS DATA

We use the information we collect about you to;

Process your bookings;
Answer your queries;
Process your voucher purchases;
Provide our food and beverage facilities and services
Provide our membership and services.

With your consent, we will contact you via our marketing and sales channels (via email, phone or post) about other related products and services we, or our group business, provide which we think may be of interest to you. Our marketing communications are generally sent by email but we may sometimes use other methods of delivery such as by post or SMS. At any time, you may stop these communications by texting "STOP" or unsubscribing.

We may use your Data collected from the Website, via cookies or direct input, to personalise your repeat visits to our Website.

We operate a centralised reservation system this means that any personal Data you have shared with us for booking purposes is available in that system for reservations and marketing purposes.

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience. Specifically, Data may be used by us for the following reasons:

- a) internal record keeping;
- b) improvement of our offers, products and Website;
- c) linking you with third parties that are offering services you may require;
- d) transmission by email of promotional materials that may be of interest to you;
- e) to pass on to the police and government authorities as requested by them, for example in cases of fraud and theft.
- f) to comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on us;

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g) linking you with third party payment collecting company for payments; and

h) contact for market research purposes which may be done using email, telephone or post.

We sometimes engage the services of trusted third parties to process the Data collected by generating anonymised statistics to assist us with our marketing campaigns and business analysis. We do not disclose this anonymised Data outside of our business group. It is not possible for the business to identify an individual from such anonymised Data presented in our internal reports.

We adhere to the following working principles:

Access to Data for our third-party clients' is restricted to our relevant staff members

Any Data disclosed to third party clients' is anonymous and you cannot be identified by it, with the exception of payment details where we use a third-party payment collecting company

All hard copies of Data and confidential documents are kept securely

All our relevant employees have received training in how to handle Data. This includes ensuring they are aware of the importance of handling Data safely and securely and understanding the procedures in place to ensure this happens.

When collecting Data for third party clients all Data is anonymised, save for payment details where we use a third-party payment collecting company

We carry out an annual data review, securely deleting any contacts that we have no legitimate business reason to retain

We have measures in place to keep the personal Data we hold safe and secure

All personal information is stored in The Swan's secure web server hosted site to which access is only granted to key personnel. Where data is downloaded to be updated, and as a backup to the cloud, it is only stored on personal drives, only accessible via individual log in

The Data Processor and the Data Controller can be contacted via email on

info@theswanatstreatley.com, please put the topic of your enquiry in the header title

The Data Controller acknowledges possible recipients of your Data include; our employees, agents, consultants, third parties and data processors

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Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

Internal record keeping

Improvement of our products, Services and Website

Linking you with third parties that are offering services you may require

Transmission by email of promotional materials that may be of interest to you

To pass on to the police and government authorities as requested by them, for example in cases of fraud and theft

Linking you with third party payment collecting company for payments

Contact for market research purposes which may be done using email, telephone or post.

Such information may be used to customise or update the Website

DATA SHARING

Where we use contracted and trusted third parties to facilitate our provision of services and offers, we will also share your Data with those parties for that purpose. This includes the processing and delivery of marketing communications to you, processing review and upgrade services and any other third-party services engaged to perform payment, business support, operational or administrative function.

All Data is processed within the UK.

Third parties are subject to confidentiality obligations and may only use your personal Data to perform the necessary functions as requested by us and not for any other purposes.

We do not share your Data with any third parties outside of the above processing arrangements and we do not share your Data with any business external to Rare Bird Hotels. From the Data we collect, you should only ever receive marketing communications from our own brand.

We may also disclose personal Data as permitted or required by law. For instance, if asked by the police or HMRC, we may share your personal Data with them for the purposes of prevention and detection of crime.

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TRANSACTION & DATA SECURITY

Whilst we take reasonable, appropriate technical and organisational measures to safeguard the personal Data that you provide to us, no transmission over the internet can ever be totally guaranteed secure. Consequently, please be aware that we cannot guarantee the complete security of any personal Data that you transfer over the internet to us whilst in transit. Sending such information is entirely at your own risk.

We understand how important it is to securely store any Data that you provide. We take the privacy and security of your payment and personal details very seriously. Although we take reasonable care to keep your personal Data secure, we cannot be held liable for any loss you may suffer from unauthorised access or loss of any Data provided.

As part of our security measures, we use encryption technologies for online transactions via our Website including "Verified" by Visa and Mastercard secure code.

To use this service, you must first register with the bank or other organisation that issued your card. You can find out more about these services by visiting the relevant Visa and Mastercard websites:

Visit the Verified by Visa website

http://www.visa.co.uk/en/security/online_security/verified_by_visa.aspx

Or visit the Mastercard SecureCode website <http://www.Mastercard.co.uk/securecode.html>

Once you have registered and created your own private password with your card issuer, you will be prompted automatically at checkout to provide this password each time you use your card on our website.

We do not have access to your Verified by Visa or Mastercard SecureCode password. This is entirely separate from any Website user account you may create with us.

You can tell whether a page is secure as 'https' will replace the 'http' at the front of the in your browser address window. A small locked padlock will also appear either in the bottom bar of your browser window or alongside the browser address, depending upon which browser software and version you are using.

Where you make a payment in person at our reception we use the secure third party payment <https://www.securetrading.com/privacy/> <https://www.barclays.co.uk/important-information/control-your-data/> If you do not agree with their privacy policy then do not purchase our services.

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When you book beauty and wellness treatments and purchase Gift Vouchers with us either online or in person we use the secure third-party processing and payment website called Timely. Please see their Privacy Policy here: <https://www.gettimely.com/support/privacy>. If you do not agree with their privacy policy then do not purchase our services. We can access your contact and booking info via Timely and see what vouchers have been purchased but we cannot access your payment info.

When you join the gym, your details are collected and stored using Membr <https://membr.com/privacy-policy>. Your membership joining fee is processed by third party Stripe <https://stripe.com/gb/privacy> and your Direct Debit is processed by third party Harlands <https://www.harlandsgroup.co.uk/wp-content/uploads/2018/04/Harlands-GDPR-Guide.pdf>

Guest wi-fi is accessed as an open network, if you choose to use the service to access websites or content provided by third parties or purchase products from, then your personal information may be available to the third-party provider. The way third parties handle and use your personal information related to the use of their services is governed by their privacy policies.

If you do not agree with their privacy policy then do not use their services. We have no responsibility for third parties' privacy policies or third parties' compliance with them. Our guest wireless systems use radio channels or local area networks to transmit voice and data communication information; privacy therefore cannot be guaranteed, and we shall not be liable to you for any lack of privacy you experience while using the service.

The IT and Communications function is managed by Doe Taylor <https://www.doetaylor.com/terms-and-conditions>

On pre-payment bookings payment is taken up-front and money taken at the time of booking. It is important that you take note of our cancellation policy in our Terms and Conditions we reserve the right to charge and take payment from your card for a "no-show" should you fail to turn up for your stay and have not let us know by the agreed time period in advance of arrival.

Where asked, you are required to be able to produce the same card, used for any booking paid in advance online, at check-in.

In addition to the Data collected via our Website when we collect Data in person we keep this information in secure files.

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MARKETING

We would like to send you information about Rare Bird Hotels group products, offers and services, which we believe may be of interest to you. If you have consented to receive our marketing, you may opt out at any time.

If you no longer wish to be contacted, you can unsubscribe by any of the following methods:

Select the UNSUBSCRIBE link included in our emails. Contact our Marketing Team on the email address info@theswanatstreatley.com and the subject matter in the email header

ASSIGNMENT

We may, from time to time, expand or reduce our business or may transfer or assign the benefit of this Privacy Policy to our parent company or associated companies this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by you will, where the original remit for the Data remains the same and it is relevant, be transferred to the new owner or newly controlling party. Subject to the new owner or controlling party strictly obeying this Privacy Policy, for the permitted use the Data for the purposes for which it was supplied by you.

Please note that this clause does not apply to any transfer of the Data outside the EEA as governed by the Data Protection Act, where it will not be transferred unless that country or territory ensures an adequate level of protection for the rights and freedoms of Data in relation to the processing of personal data.

ACCESSING & AMENDING YOUR DATA

You have a right to access a copy of the Data which we hold about you. If you would like to do this, please email us at info@theswanatstreatley.com and the subject matter in the email header or write to us at the address above. As per the terms of the GDPR, we will provide the Data within 28 days of receipt of your request.

We want to make sure that your personal Data is accurate and up to date.

You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.

You are able to make amendments, or withdraw your consent for use, by telling our reception staff when you check in or by contacting our Data Processor via email at info@theswanatstreatley.com and the subject matter "Opt Out" in the email header.

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If you withdraw your consent to any or all use of your personal Data, depending upon the nature of your request, we may not be able to provide or continue providing our products and services to you, or administer any contractual relationship already in place. You understand and agree that in such instances where we require your personal Data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant personal Data for those purposes, we cannot be held liable for breach of that agreement. Our legal rights and remedies in such event are expressly reserved.

RETENTION OF INFORMATION

Your personal Data will be retained for as long as it is necessary to fulfil the purpose for which it is collected, for business or legal purposes, or in accordance with applicable laws.

Should you choose to unsubscribe from our mailing list or if your membership expires, please note that your personal Data may still be retained on our database for up to 12 months or to the extent permitted by law.

COOKIES

We may set and access Cookies on Your “Computer” meaning any computer, laptop, tablet, mobile or other device that the Website can be viewed on.

A “Cookie” is a small file of letters and numbers which asks permission from your browser to be placed on your Computer's hard drive. Cookies allow web applications to respond to you as an individual and allow us to distinguish you from other users on our Website. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences and allows us to improve our Website.

Our Cookies use:

- a. Google Analytics Cookies to identify which pages are being used. This helps us analyse data about web page traffic (the number of visitors and how visitors move around our Website when they are using it) and improve our Website in order to tailor it to your needs.
- b. third party Cookies within our email campaigns, predominantly sent using third party email marketing tools, as well as Google Analytics. Cookies are used to monitor open rates and improve your experience and also for the tracking of website activity initiated from hyperlinks within email marketing campaigns.

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c. Session Cookies on our Website. These are temporary Cookies, which only exist in the period you access the Website (or more strictly, until you close the browser after accessing the Website). Session Cookies help the Website remember what you chose on the previous page, therefore avoiding having to re-enter information.

d. Cookies used for customer email, customer name, customer id*, token*, customer profile link*, customer flags* (*= generated by our own system) and social media share.

The length of time a Cookie will remain on your Computer will depend on the type of Cookie. On our Website, these Cookies do not contain personal information, and cannot be used to identify you.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies; however, this can be altered. For further details please consult the help menu in your browser on your Computer and search for “cookies”.

PHISHING

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user, in an attempt to get the user to send private information that will be used for criminal activities such as identity theft and fraud.

Save where you are sending us your signed contract such as membership or treatment form via email. We will never separately ask you to confirm any account or credit card details via email. If you receive an email claiming to be from us asking you to do so, please ignore it and do not respond. You can contact our reception staff by phone or when you check in or by contacting our Data Processor via email at info@theswanatstreatley.com and the subject matter “Credit Card Fraud” in the email header to report it or if you are unsure.

We will on occasion take bookings over the phone. We will give our name and name of our company when we do this. If you are anxious about the phone call, revealing your payment details or do not believe that the person on the other end of the phone is us, we suggest you put the phone down and ring us directly using the telephone number on our website asking for the person you spoke to.

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LINKS TO OTHER WEBSITES

This Privacy Policy applies solely to Data collected by us. Our Website may contain links to external sites, operated by other owners and third parties, over which we have no control. For this reason, we encourage our visitors to be aware when they leave our Website to read their privacy policy applicable. Any access to such other websites or pages is entirely at your own risk. We are not responsible for the privacy policies, content or security of any third-party websites linked to our Website

CHANGES TO OUR PRIVACY POLICY

This Privacy Policy is regularly reviewed. Following any changes, the new version of the policy will be uploaded to our Website and the old version removed. Please check back frequently to see any updates. This was updated last in May 2018.

ANY QUESTIONS?

Any questions on this Privacy Policy please email: info@theswanatstreatley.com and the subject matter Privacy Policy in the email header.