



## Your Privacy

Cotswold Inns and Hotels takes the privacy of our customers information very seriously. With that in mind, we have produced and adhere to a detailed [privacy policy](#) in line with the General Data Protection Regulation (GDPR) - a regulation in UK and EU law on data protection and privacy for individuals within the UK and EU.

Our [Privacy Policy](#) details what personal information we hold about you, what we use the data for, how we store your personal information, how we share data, transaction and data security, your right to access, amend and delete your data.

We have prepared a detailed policy so that you can make an informed decision about the extent you provide your information to us. Please do not use our site if you do not agree with the Privacy Policy.

In summary:

- We will take reasonable steps to protect the security of the Personal Information we collect from you.
- We will not disclose your Personal Information to third parties except as described in this policy.
- We will allow you to view, correct or remove your Personal Information and other information that we have collected.
- We will not keep your personal data on file for any longer than is legally required or a term you agree to.
- We will not send you details of our exclusive offers, event and news unless you "opt in" to our mailing list.

# Privacy Policy

Cotswold Inns and Hotels takes the privacy of customers and their information very seriously. This policy explains how we use any personal information we collect about you, your rights to access and correct the personal information we hold about you.

For the purpose of this document, "CIH" will refer to Cotswold Inns and Hotels Ltd and "you" the user of the CIH website and services and facilities, that is 16 years old or older and capable of entering a contract.

By consenting (opting in) and agreeing to provide CIH with your personal information "Data" (as defined below), whether through the website or in person, you consent, agree and accept that CIH as well as respective representatives and/or third-party agents may collect, use, disclose and share your personal data as described in this Privacy Policy.

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

## 1.0. What personal information does CIH collect about you?

CIH collect personal data from you when you make an enquiry, a reservation, purchase a gift voucher, either in person or over the phone, and also when you make a reservation online.

Cotswold Inns and Hotels also collect data from you when you subscribe to CIH marketing communications, connect using CIH social media websites, enter CIH competitions or provide feedback. These may be carried out online, by telephone or in person.

Without limitation, any of the following personal data may be collected:

- Your full name
- Contact information such as email address, landline and/or mobile telephone numbers
- Home address and postcode
- Your credit or debit card details if you are making a payment
- Preferences and interests
- The month of your birthday
- Your special dietary requirements and allergies
- Car registration number
- Passport details (only for guests who reside outside of the commonwealth)
- Your IP address
- Your web browser type and version
- Your operating system
- A list of URLs starting with your referring site, activity on our website, and the website you exit to
- Your cookie information

If you provide CIH with any personal Data relating to any third party (e.g. information about your spouse, companion, employees or colleagues) for particular purposes, by submitting such information, you do so at your own risk having obtained the consent of such third party to provide CIH with their personal Data for the respective purposes.

We never knowingly collect data from anyone under the age of 16.

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## 2.0 What do CIH use your Data for?

CIH use the information collected about you to:

- Reply to your questions and enquiries
- Respond to your feedback
- Process your bookings, reservations and purchases (see 2.1.)
- Keep you updated on latest news, offers and events at CIH properties (see 2.2)
- Monitor the CIH website and email performance using Cookies (see 2.3)

### 2.1. Bookings, reservations and purchases

CIH operate a centralised reservation system. This means that any personal Data you have shared for booking purposes is available in that system and can be accessed at any Cotswold Inns and Hotels property or central office.

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

- Internal record keeping
- Providing you with confirmation of the services CIH have provided to you
- Connecting you with third-party agents that offer services you may require (including but not limited to making a table reservation during your stay)
- Connecting you with a third-party payment collection company for processing payments
- To pass on to the police and government authorities as requested by them, for example in cases of fraud and theft
- To comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on CIH
- To notify you of any security or data breach alerts

### 2.2. Marketing

CIH will only contact you via marketing channels (email, phone or post) with news and offers relating to Cotswold Inns and Hotels as a group, or individual properties, if you have given your consent by "opting in" to marketing communications. Consent can be given by, but not limited to, signing up to the newsletter on the website, ticking the box to give your permission whilst making a booking, purchase, enquiry, or checking in to the hotel/s. CIH marketing communications are generally sent by email and include news, offers and events.

You can stop marketing communications at any time by clicking the "UNSUBSCRIBE" link at the bottom of each marketing email. Alternatively, you can email [marketing@cotswold-inns-hotels.co.uk](mailto:marketing@cotswold-inns-hotels.co.uk) to request manual deletion from the mailing list, typing "UNSUBSCRIBE" in the subject line.

Please note that as a result of operational requirements, CIH may still be required to contact you from time to time regarding any past, present or future bookings that you have made (see 2.1. for details).

#### 2.2.1 Social Media

If you choose to connect with CIH via social media websites, such as Facebook, Twitter or Instagram, CIH may collect your username (which may contain your name and surname) by you “liking” or “following” CIH. CIH may also occasionally run competitions via these social media websites – some of which may direct you to a separate competition page on a third-party website such as Wufoo. Please ensure you study their privacy policy before continuing.

Please note that by connecting with CIH via social media websites you are bound by their own Terms and Conditions and Privacy Policies.

### 2.2.2 Google Adwords

CIH occasionally use Google AdWords remarketing services to advertise on third-party websites (including Google) to previous visitors to this site who haven’t completed particular tasks, such as submitting an enquiry form or clicking to book. Remarketing could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone’s past visits to the CIH website. Any data collected will be used in accordance with the CIH privacy policy and Google’s privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## 2.3. Cookies

CIH 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 permissions 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 the website. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences and allows CIH to continually improve the website.

Cookies do not take up much space (unless you have thousands of them) and cannot contain viruses or other harmful code.

Cotswold Inns and Hotels use cookies including but not limited to:

- 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 the CIH Website when they are using it) and improve the Website in order to tailor it to your needs.
- Third party Cookies within CIH 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.
- Session Cookies. These are temporary Cookies on our website which only exist in the period you access the it (or more specifically, 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.

The length of time a Cookie will remain on your Computer will depend on the type of Cookie. On the CIH Website, these Cookies do not contain personal information, and cannot be used to identify you. To find out more about how to manage cookies through your chosen browser go to: [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/)

You may delete/disable your Cookies or manage your Cookies preferences but if you do decide to disable or delete the Cookies altogether please note that the CIH Website may not work as well as it could.

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”.

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### 3.0 How do CIH look after your Personal Data?

To ensure that your data is treated with the highest regard and compliant with legal requirements, it is CIH company policy to:

- Ensure all relevant employees have received training in how to correctly handle Data. Training includes educating employees in the importance of the safe and secure handling of Data, and the procedures in place to ensure all Data is handled in this way.
  - Anonymise all data collected for third-party clients save for payment details where CIH use third-party payment collecting company; Secure Trading Ltd.
  - Evaluate the CIH database every 12 months and securely delete any contacts that are either no longer engaged or no longer required to meet with the reasoning outlined in 2.1.
  - Always adhere to the internal procedures and measures in place to keep any personal Data held safe and secure.
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### 4.0 How do CIH store your personal information?

To ensure your data is stored safe and legally CIH use the following trusted third-party agents:

#### **Property Management System (PMS)**

CIH properties use the ‘RoomLynx’ third-party PMS to store all bedroom reservation history.

#### **Internet Booking Engine**

CIH properties use the ‘RezLynx’ third-party online Booking Engine (OBE) to take hotel reservations on the website ([www.cotswold-inns-hotels.co.uk](http://www.cotswold-inns-hotels.co.uk)).

Both RoomLynx and RezLynx are provided by Guestline Limited (Guestline).

Details of Guestline's policies can be found at <https://www.guestline.com/about-us/about-guestline/gdpr.html>

### **Content Management System (CMS)**

CIH use the 'Wordpress' CMS to manage the website ([www.cotswold-inns-hotels.co.uk](http://www.cotswold-inns-hotels.co.uk))

### **Gift Vouchers**

CIH properties use the 'Gifted' third-party system to facilitate all gift voucher purchases. The secure payment system used when purchasing a voucher is Sage Pay.

### **Email Marketing Application**

CIH use the 'Campaign Monitor' application for all email marketing activity.

The Website CMS, Gifted and Campaign Monitor are all services supplied and managed by Journey (trading name of Hotel Marketing Group Limited). Please review their Privacy Policy.

### **Online Payments and Credit Card storage**

CIH store credit and debit card details for pre-authorisation and payment when bookings are taken online. These are facilitated via a third-party payment processor called 'Secure Trading'.

Please review their Privacy Policy and if you do not agree, please do not purchase CIH services online.

### **Restaurant Diary**

CIH properties use the 'Resdiary' third-party system to store all restaurant reservations and to facilitate online restaurant bookings. The Restaurant Diary widget that you use to book a table at one of CIH restaurants uses Cookies to help you personalise your online experience and store some of your booking details. Further details of Resdiary's policies can be found at: <https://sales.resdiary.com/gdpr-terms-conditions/>

### **Function diary**

CIH use a centralised cloud-based function and events diary called Venue Express. Please review their Privacy Policy.

In addition to the Data collected via the website, there are some occasions where CIH must collect data in person. This information is filed securely at all times with restricted access to keys and passwords.

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## **5.0 Data Sharing**

Cotswold Inns and Hotels will never sell your data to a third party for marketing purposes.

Your data will be shared within the Cotswold Inns and Hotels group on our password protected, centralised Property Management System (see 4.0).

If required or deemed necessary, CIH may on occasions share your data with other organisations in the following way/s:

### **5.1. To facilitate services and offers**

Where contracted and trusted third parties are used to facilitate services and offers, CIH will share your Data with those parties for that purpose, and that purpose only. This includes the processing and delivery of

marketing communications, and any other third-party services engaged to perform payment, business support, operational or administrative function. Third parties are subject to confidentiality obligations. (See 4.0)

## 5.2 The sale of a property

CIH may on occasion expand or reduce the collection of hotels, and this may involve the sale of a property. Where the original remit for the Data remains the same and is relevant, Data provided by you will be transferred to the new owner or controlling party. Should this situation arise, your data will only be shared if the new owner or controlling party strictly adhere to this policy for the permitted use of the Data and the purposes for which it was supplied by you.

## 5.3. Legal requirement

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

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## 6.0 Transaction and Data Security

CIH are committed to protecting the confidentiality and security of the information that you provide to. To do this, technical, physical and organizational security measures are put in place to protect against any unauthorized access, disclosure, damage or loss of your information. The collection, transmission and storage of information can never be guaranteed to be completely secure, however, we take steps to ensure that appropriate security safeguards are in place to protect your information.

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## 7.0 Accessing and amending your Data

You have a right to access a copy of the Data CIH hold about you. If you would like to do this, please write to CIH at the address at the bottom of this document and enclose a stamped self-addressed envelope. The following details are also required in order to verify your identity before CIH can release the data:

- Full name
- Address
- Email address
- Telephone number
- Details of your previous or forthcoming stays with Cotswold Inns & Hotels

Upon receipt of your written request and all the details above, CIH will provide the Data within thirty (30) days.

CIH want to make sure that your personal Data is kept accurate and up-to-date so 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 changed. You are able to make amendments by telling CIH reception staff when you check in or by contacting CIH via email at [marketing@cotswold-inns-hotels.co.uk](mailto:marketing@cotswold-inns-hotels.co.uk) with "UPDATE" in the subject line.

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## 8.0 Retention of your Data

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 the CIH marketing list (see 2.2) please note that your personal Data may still be retained on the CIH database for a minimum of 12 months or to the extent permitted by law.

As part of CIH Google Analytics tracking, user-level data and event-level data associated with cookies, user-identifiers (e.g., User-ID) and advertising identifiers are collected for the purpose of monitoring the performance of the CIH website. This data is retained within Google Analytics for 38 months before being automatically deleted.

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## 9.0. Deleting your Data

You have a right to withdraw your consent of use. If you wish for your entire data records to be deleted, please email: [marketing@cotswold-inns-hotels.co.uk](mailto:marketing@cotswold-inns-hotels.co.uk) with "DELETION" in the subject line.

CIH can only delete your data in accordance with applicable laws and once any contractual obligations have concluded, including payment for previous contractual obligations.

If you wish to withdraw your consent to any or all use of your personal Data, depending upon the nature of your request, CIH 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 CIH 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, CIH cannot be held liable for breach of that agreement. CIH legal rights and remedies in such event are expressly reserved.

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## 10.0 CCTV

CIH have CCTV installed at all properties in public areas and particularly around entrances and exits. This is for the purposes of prevention and detection of crime and monitoring of staff. The images captured on the CCTV system are overwritten on a rolling 30-day basis.

Only senior appointed staff within the organisation have access to replay the CCTV footage, which is password protected.

CIH may disclose CCTV footage as permitted or required by law. For example, footage may be shared with the Police if requested for the purposes of prevention and detection of crime.

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## 11.0 WiFi

If you choose to use the complimentary guest WiFi at CIH hotels you will require a password to log-on to the service. Once logged onto the service you will automatically be diverted to the Cotswold Inns and Hotels website ([www.cotswold-inns-hotels.co.uk](http://www.cotswold-inns-hotels.co.uk)) which uses cookies (see 2.3). The cookies used on the CIH website do not contain personal information and cannot be used to identify you.

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## 12.0 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.

CIH will never ask you to confirm any account or credit card details via email. If you receive an email claiming to be from CIH asking you to do so, please ignore it and do not respond. If you are unsure whether an email from CIH is legitimate, please forward it to [marketing@cotswold-inns-hotels.co.uk](mailto:marketing@cotswold-inns-hotels.co.uk) with your message and the subject line "FRAUD". CIH will then reply to advise you on the situation.

CIH will on occasion take bookings over the phone. On these occasions, CIH employees will state their name and the company name. 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 an employee of CIH, please put the phone down and ring the hotel or office directly asking for the person you spoke to. Telephone numbers are available on the CIH website.

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## 13.0 Links to other websites

This Privacy Policy applies solely to Data collected by CIH. The CIH website ([www.cotswold-inns-hotels.co.uk](http://www.cotswold-inns-hotels.co.uk)) may contain links to external sites, operated by other owners and third-party agents, over which CIH have no control. For this reason, CIH encourage our visitors to be aware when they leave the Website to read applicable privacy policies. Any access to such other websites or pages is entirely at your own risk. CIH are not responsible for the privacy policies, content or security of any third-party websites linked to the CIH website.

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## 14.0 Changes to the CIH Privacy Policy

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

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## 15.0 Any Questions?

Should you have any questions regarding this Privacy Policy please contact Cotswold Inns and Hotels using the details below:

Email: [marketing@cotswold-inns-hotels.co.uk](mailto:marketing@cotswold-inns-hotels.co.uk)

Address:

Cotswold Inns and Hotels Ltd.

Orchard House.

Crab Apple Way.

Vale Business Park.

Evesham.

WR11 1GE

Phone: 01386 769100

Company number: 3309179