



NEOS

HOSPITALITY

Privacy Notice

1. Introduction

- 1.1 NEOS Holdco LTD are committed to protecting and respecting your privacy.
- 1.2 This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.3 NEOS HOLDCO LTD of 42-43 St Mary Street, Cardiff, Wales, CF10 1AD, with registration number 15420951 ("**NEOS Hospitality**", "**we**", "**us**" or "**our**") is the controller and responsible for your personal data.

2. Information we may collect from you

2.1 We may collect and process the following data about you:

(a) **Information you give us.** You may give us information about you by:

- (i) filling in forms on our website;
- (ii) corresponding with us by phone, e-mail, SMS, social media or otherwise;
- (iii) by allowing us to take copies of your identification document(s);
- (iv) subscribe to any of our services including our loyalty app;
- (v) participate in discussion boards or other social media functions on our website;
- (vi) sign in to use our WiFi;
- (vii) enter a competition, promotion or survey;
- (viii) when you report a problem with our website;
- (ix) when you use machines at our sites including Vendnation and Lightbooth;

The information you give us may include your name, address, e-mail address, mobile or fixed-line telephone number, date of birth, gender, personal appearance description, photograph, the College or University you attend ("**Identity and Contact Data**").

(b) **Information we collect about you.** With regard to each of your visits to our website or purchases for our products or services we may automatically collect the following information:

- (i) details about payments to and from you and other details of products and services you have purchased from us. ("**Transaction Data**");
- (ii) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time-zone setting, browser plug-in types and versions, operating system and platform ("**Technical Information**");
- (iii) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page ("**Usage Data**").

- (c) **Marketing and Communications Data.** We will collect data from you in relation to your preferences in receiving marketing from us and our third parties and your communication preferences (“**Marketing and Communications Data**”).
- (d) **Information we receive from other sources.** We may receive information about you from various third parties as set out below:
 - (i) Technical Data may be collected from analytical providers such as Google;
 - (ii) Identity and Contact Data and Transaction Data is collected from our third party suppliers such as Lightbooth, Vendnation, Playable and Airship, and third party booking agencies such as FIXR and Collins.

3. Cookies

3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

4. How we use your personal data

- 4.1 The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:
- (a) **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
 - (b) **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
 - (c) **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
 - (d) **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

4.2 We have set out below, in a table format, a description of all the ways we plan to use the various categories of 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.

Purpose/Use	Type of data	Legal basis
To provide you with products or services requested by you	(a) Identity (b) Contact	Performance of a contract with you

	(c) Transaction Data	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Transaction Data (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website , products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) or Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

5. Marketing

- 5.1 You will receive marketing communications from us if you have requested information from us, purchased goods or services from us, entered a game via our gamification platform, you enter a prize, draw, competition or survey and you have not opted out of receiving the marketing.
- 5.2 We may also analyse your Identity, Contact, Technical and Usage Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.
- 5.3 We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.
- 5.4 You can ask to stop sending you marketing communications at any time unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links within any marketing communication sent to you or by contacting us.
- 5.5 If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations, updates to our Terms and Conditions, checking that your contact details are correct.

6. Disclosures of your personal data

- 6.1 We may share your personal data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- 6.2 We may share your information with selected third parties including business partners, suppliers, agents and sub-contractors for the performance of any contract we enter into with them or you.
- 6.3 When you sign into our website using your Facebook login details, you give permission to Facebook to share with us your email address and certain aspects of your Facebook profile if you have made these available through your Facebook privacy permissions. This may include your first and last name, age range, link to your Facebook profile and profile picture, if you have allowed this in your Facebook privacy settings. We do not, however, have access to updates on your Facebook profile. The same principles apply if you log in to our website using your Google login details.
- 6.4 We may disclose your personal data to third parties:
 - (a) if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - (b) if NEOS Hospitality or substantially all of its assets are acquired by a third party, in which case personal data held by it about its guests will be one of the transferred assets;
 - (c) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use Terms and Conditions of Booking and other agreements; or to protect the rights, property, or safety of NEOS Hospitality, our guests, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6.5 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

7.1 We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

7.2 Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- (a) We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- (b) We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

8. Data security

8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

8.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

9.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

9.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9.3 By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes.

10. Your legal rights

10.1 You have a number of rights under data protection laws in relation to your personal data.

10.2 You have the right to:

- (a) Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- (e) You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- (h) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - (i) If you want us to establish the data's accuracy;
 - (ii) Where our use of the data is unlawful but you do not want us to erase it;
 - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

10.3 If you wish to exercise any of the rights set out above, please contact us.

10.4 **No fee usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

10.5 **What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.6 **Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. **Contact details**

11.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to NEOS Hospitality, 42-43 St Mary Street, Cardiff, Wales, CF10 1AD

12. **Complaints**

12.1 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

13. **Changes to the privacy policy and your duty to inform us of changes**

13.1 We keep our privacy policy under regular review.

13.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

14. **Third-party links**

14.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.