

BEAVERBROOK PRIVACY POLICY

1. Introduction

Welcome to the privacy notice of Beaverbrook.

We at Beaverbrook respect your privacy and are committed to protecting your personal data.

2. Who we are and Important Information

Beaverbrook is the data controller.

Beaverbrook is the trading name of Beaverbrook Holdings Limited (Company Number 07457718), and its subsidiaries Beaverbrook Golf Club Limited (Company Number 07489374) & Beaverbrook Estates Limited (Company Number 07754188) having their registered offices at Beaverbrook, Reigate Road, Leatherhead, Surrey, KT22 8QX, United Kingdom. Our main trading address and address for correspondence is Beaverbrook, Reigate Road, Leatherhead, Surrey, KT22 8QX, United Kingdom.

For simplicity throughout this notice, 'we' and 'us' means Beaverbrook.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It is likely that we will need to update this Privacy Notice from time to time. We will notify you of any significant changes, but you are welcome to come back and check it whenever you wish.

Our 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 notice of every website you visit.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, maiden name, last name, marital status, title, date of birth, gender, image, your social media profile name, the profile information that you share publicly on social media, and your family member's identity data including your children's first name, last name, date of birth, gender and image (If you provide your/your children's passport, it will also include place of birth, facial image and nationality);
- **Contact Data** includes billing address, home or work address, company name, email address and telephone numbers;

- **Financial Data** includes bank account and payment card details (but not your pin number or 3 or 4 digit Card Verification Value);
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Profile Data** includes your purchases or bookings made by you, your interests, preferences, dietary requirements, feedback and survey responses;
- **Usage Data** includes information about how you use our website, products and services;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
- **Interaction Data** includes details of your interactions with us through our reception or reservation teams, or online;
- **Health Data** is restricted to any medical condition, disability or other educational needs that may impact your/your child's visit to Beaverbrook.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Apart from the Health Data described above, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences in relation to our visitors.

4. Children's data

Our website is not intended for children.

At Beaverbrook, we make sure we only process your children's data when it is absolutely necessary for us to do so.

For instance, we may process your children's data that are provided in the course of the use of our services. Such data may include information provided to us from you before visiting Beaverbrook, such as Identity Data (name and data of birth of your children) and Health Data. Such data will also include your children's image captured by our CCTV system during their visit to Beaverbrook.

The legal basis for this processing is our legitimate interest in properly administering your children's ability to use our services (e.g. making adjustments to your children's experience at Beaverbrook as necessary), in ensuring that we provide a safe environment for our visitors and employees and in protecting your legal rights, our legal rights and the legal rights of others.

We may also process your children's data contained in any enquiry you submit to us regarding our services. Such data may be processed for the purposes of offering, marketing and selling relevant products or services to you. The legal basis for this processing is consent (in the case of marketing material sent to people who have not visited Beaverbrook yet) and our legitimate interests in properly administering your ability to use our services (e.g. booking confirmations).

The free Wi-Fi in our premises is intended for use of adults only.

5. How is personal data collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, on social media or otherwise. This includes personal data you provide when you:
 - apply for/use our products or services (including when you make a booking, visit one of our restaurants, stay in one of our hotels or use any of our facilities);
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a prize draw, competition, promotion or survey;
 - inform us about any health issue or specific need that you or your children have and which requires us to adapt our services;
 - give us some feedback; or
 - contact us with queries, complaints.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <https://beaverbrook.co.uk/cookies/> for further details.
- **CCTV.** Our premises have CCTV systems operated for the security of both our visitors and employees. These systems will record your image and the image of your children during your visit.
- **Photography.** Due to the nature of our business, it is possible that your image will be captured on either still or video photography. We will endeavour to delete any images that include recognisable features or items. If we chose to use such images we would obtain written permission in advance.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Transaction Data from providers of technical and payment services such as ResDiary, World Pay, YesPay;
 - Identity and Contact Data from publicly available sources such as Companies House.

6. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please see our table below to find out more about the types of lawful bases that we will rely on to process your personal data.

Purposes for which we will use your personal data

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

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new visitor or member	(a) Identity (b) Contact	Performance of a contract with you
To process your booking and deliver your booking confirmation including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To register you as a Newsletter subscriber	(a) Identity (b) Contact	Consent
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

(b) Asking you to leave a review, a post-dining feedback or take a survey (c) Dealing with your enquiries, complaints		(c) Necessary for our legitimate interests (to keep our records updated, to maintain good relationships with our visitors and to study how visitors use our products/services)
To ensure that you, your family and your guests have the best time at Beaverbrook	(a) Identity (b) Health (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure that appropriate arrangements are in place for our visitors)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how visitors use our products/services, to develop them and grow our business)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how visitors 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, marketing, visitor relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of visitors for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you (Marketing)	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Consent
To obtain and maintain insurance coverage, manage	(a) Identity (b) Contact	Necessary for our legitimate interests (protection and assertion of

risks, obtain professional advice and manage dispute	(c) Interaction	our legal rights, your legal rights and the legal rights of others)
--	-----------------	---

7. How we protect your personal data

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.

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.

8. How long we will keep your personal data

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

When you make a booking, we will keep the personal data you give us for seven years, so we can comply with our legal and contractual obligations.

9. Who we share your personal data with

We sometimes share your personal data with trusted third parties.

For example, for fraud management, to handle complaints, to help us personalise our offers to you and so on.

Here is the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the type of third parties we work with are:

- IT companies who support our website and other business systems
- Professional advisers including lawyers, bankers, auditors and insurers;
- Fraud prevention agencies;
- Operational companies such as delivery couriers;
- Companies helping personalise and automate your journey with us such as ResDiary, SynXis, Resort Suite & WorldPay;

Sharing your data with third parties for their own purposes:

- We will only do this in very specific circumstances, for example:
 - If you enter a competition and tick a box agreeing that the third party can send you promotional information directly.
 - For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
 - We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our visitors into consideration.
 - We may, from time to time, expand, reduce or sell all or part of our business and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA.

For example, this might be required in order to store your personal data, fulfil your booking, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Compliance Manager.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

11. What are your rights over your personal data?

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to request:

- access to the personal data we hold about you, free of charge in most cases;
- the correction of your personal data when incorrect, out of date or incomplete;
- that we stop using your personal data for certain purposes including direct marketing (either through specific channels, or all channels);
- that we stop any consent-based processing of your personal data after you withdraw that consent;

- that we delete your data from our records.

To exercise any of your rights, please contact The Data Protection Compliance Manager, Beaverbrook, Reigate Road, Leatherhead, Surrey, KT22 8QX, United Kingdom or email gdpr@Beaverbrook.co.uk

If we choose not to action your request, we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Your right to have your data deleted

Sometimes we will be entitled to keep some of your data, even though you want us to delete them from our database. These exclusions include where processing is necessary for exercising our right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

What we may need from you

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

We may also 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.

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 may refuse to comply with your request in these circumstances.

Time limit to respond

We will respond to all legitimate requests within 30 days.

12. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular division.

Write to The Data Protection Compliance Manager, Beaverbrook, Reigate Road, Leatherhead, Surrey, KT22 8QX, United Kingdom or email gdpr@Beaverbrook.co.uk.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we cannot be responsible for the content of external website).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

14. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that have not been covered, please contact our Data Protection Compliance Manager who will be pleased to help you:

Email us on gdpr@Beaverbrook.co.uk

Or write to us at

The Data Protection Compliance Manager
Beaverbrook
Reigate Road
Leatherhead
Surrey
KT22 8QX
United Kingdom

This notice was last updated on 17 March 2021