



## PRIVACY POLICY

Protecting your privacy is one of our prime responsibilities and priorities at Cap St Georges Hotel & Resort.

Under certain circumstances you are trusting us with some personal information of yours while engaging with our website and this privacy notice aims to inform you as to how we look after them during and after you visit our website. Within this section you will also be informed about your privacy rights and how the law protects you, what cookies we collect and how we use them and the security policy that we follow in order to protect the data you choose to share with us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements any other notices or policies and is not intended to override them.

### PERSONAL DATA AND COLLECTION

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 from you, use, store and transfer different kinds of personal data about you if you register online with us, subscribe on our mailing list, access and/or use our website or carry out transactions for reservations or any other services available through our website.

The type of personal data which you might be requested to provide is:

- **Identity Data** (may include first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender)
- **Contact Data** (may include billing address, delivery address, email address and telephone numbers)
- **Financial Data** (may include bank account and payment card details)
- **Transaction Data** (may include details about payments to and from you and other details of products and services you have purchased from us)



- **Technical Data** (may include 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** (purchases or orders made by you, your interests, booking or accommodation preferences, feedback and survey responses)
- **Usage Data** (may include information about how you use our website, products and services)
- **Marketing and Communications Data** (may include your preferences in receiving marketing from us and our third parties and your communication preferences)

We may 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.

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.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We may have to share your personal data within our company to the extent that is necessary for the purposes for which the personal data was collected for and with some third-party companies under specific contract terms in accordance with the applicable laws, whose services we employ to conduct our business or in relation to any supply of products and services by us. Disclosure of your personal data may also be required in order to comply with any applicable laws.



In the instances where you have consented to the use of your personal data for the purposes of advertising and/or marketing we may share your personal data with third party online service providers who may be located outside of the EEA.

Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it and that all third parties respect the security of your personal data and 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.

**List of Processors:**

Website: [www.stgeorges.com](http://www.stgeorges.com)

Online Reservation System: [www.stgeorges.com](http://www.stgeorges.com) (web hotelier)

Hotel & Resort Management System: Theova UHS Enterprise Solutions Ltd

**MARKETING COMMUNICATIONS**

We will only send you marketing emails where you have agreed to this. You can opt out of our advertising and marketing [privacy@capstgeorges.com](mailto:privacy@capstgeorges.com) at any time by any of the following methods:

- a. Selecting the UNSUBSCRIBE link included in our emails; OR
- b. Contacting our Marketing Team at [privacy@capstgeorges.com](mailto:privacy@capstgeorges.com) and request to remove you from our mailing list.

**RETENTION OF YOUR PERSONAL DATA**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 unauthorized 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 requirements.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



## **CHANGE OF OUR PRIVACY POLICY**

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use the information we collect and under what circumstances we disclose it.

## **YOUR LEGAL RIGHTS**

At any time, you have the legal right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at [privacy@capstgeorges.com](mailto:privacy@capstgeorges.com)

## **Fees**

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.

## **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.

## **Response time frame**

We try to respond to all legitimate requests within a week. Occasionally it may take us longer than a week 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.



## **CONTACTING US ABOUT YOUR DATA PROTECTION**

If you have any questions about this privacy notice or how we handle your personal information, or placing a complaint, please contact us at [privacy@capstgeorges.com](mailto:privacy@capstgeorges.com)