



## TYN Y CORNEL HOTEL PRIVACY STATEMENT

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Notice describes our policies and practices regarding its collection and use of your personal data in accordance with the General Data Protection Regulations (GDPR) (EU) 2016/679 and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies.

This website is operated by Adventure Travel Limited located at, Tyn Y Cornel Hotel, Tal-l-lyn, Tywyn, Gwynedd, LL36 9AJ Company number 03203496, also referred to in this Privacy Statement as “us” or “we” or “our”. The Tyn Y Cornel website is listed under the following domain names [www.tynycornel.com](http://www.tynycornel.com).

This Privacy Statement and any correspondence is between Adventure Travel Ltd, (covering Tyn Y Cornel Hotel) 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 when you book online via our Website. We also collect data when you fill in our registration forms, feedback forms, fishing and boat hire registration forms or by connecting using our social media websites. Facilities include but are not limited to the following; Tyn Y Cornel Hotel including, restaurant bookings, fishing and boating activities and the guest wifi.

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:



- a) Your full name;
- b) Your contact information such as email addresses and telephone/mobile numbers;
- c) Your demographic information such as preferences and interests;
- d) Your geographic information such as home address and post code (where applicable);
- e) Your date of birth
- f) Your IP address (automatically collected);
- g) Your web browser type and version (automatically collected);
- h) Your operating system (automatically collected);
- i) Your credit or debit card details where you make a payment
- j) A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected); and
- k) Your Cookie information (see below).

We store credit and debit card detail when bookings are taken online for both pre-authorisation and payment, these are facilitated via a third party called Secure Trading Financial Services Ltd via their system Secure Trading.

Their privacy policy can be found here <https://www.securetradingfs.com/privacy/> If you do not agree with their privacy policy then do not purchase our services.

If you choose to connect with us via social media websites, for example such as Facebook, Instagram 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 a particular purpose, 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.

## WHAT DO WE USE THE DATA COLLECTED ABOUT YOU FOR ?

We use the information collected about you to: - Reply to your questions and enquiries - Respond to your feedback - Process your bookings, reservations and purchases, -Keep you updated on latest news, offers and events at the Tyn Y Cornel Hotel - Monitor the website and email performance using Cookies, - Provide our food and beverage facilities and services, - For other legitimate business purposes.

We 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 the Tyn Y Cornel property or central office.



Any or all of the aforementioned 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 for the following reasons:

- Internal record keeping
- Providing you with confirmation of the services we 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 us
- To notify you of any security or data breach alerts.

## MARKETING

We would like to send you information about Tyn Y Cornel's 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 or on our Website
- Contact our Data Processor on the email address: [manager@tynycornel.com](mailto:manager@tynycornel.com) and the subject matter "UNSUBSCRIBE" in the email header.

Please note that as a result of operational requirements, we may still be required to contact you from time to time regarding any past, present or future bookings that you have made.

## 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:

- 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 to tailor it to your needs.
- 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 for the tracking of website activity initiated from hyperlinks within email marketing campaigns.
- 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.
- Cookies used for customer email, customer name, customer id\*, token\*, customer profile link\*, customer flags\* (\*= these are 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.

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/)

## HOW DO WE LOOK AFTER YOUR PERSONAL DATA?

To ensure that your data is treated with the highest regard and compliant with legal requirements, it is our 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 we use third party payment collecting company; Secure Trading Ltd.
- Evaluate our 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 above.

Always adhere to the internal procedures and measures in place to keep any personal Data held safe and secure.



## HOW DO WE STORE YOUR PERSONAL INFORMATION?

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

Property Management System (PMS) our properties use the 'RoomLynx' third-party PMS to store all bedroom reservation history.

Internet Booking Engine our properties use the 'RezLynx' third-party online Booking Engine (OBE) to take hotel reservations on the website ([www.tynycornel.com](http://www.tynycornel.com)). 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/aboutguestline/gdpr.html>

Online Payments and Credit Card storage. We 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 our services online.

Data collected for newsletter subscription is held on our website server hosted by Enix Ltd t/a Host Presto. Details of Enix Ltd t/a Host Presto policies can be found at: <https://hostpresto.com/terms/>

Newsletter distribution is facilitated via a third-party service operated by Brevo whose terms, policies legal notice, and privacy policy can be found at: <https://www.brevo.com/>

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

## TRANSACTION AND 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. 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 called Barclaycard Merchant Services.



Please see their privacy policy here. <https://www.barclaycard.co.uk/business/privacy-and-cookie-policy> If you do not agree with their privacy policy then do not purchase our services.

Our guest Wi-Fi service is provided by a contracted trusted third party called British Telecom <https://www.btplc.com> 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. British Telecom's privacy policy is here <https://www.productsandservices.bt.com/privacy-policy/>. 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.

On pre-paid 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 with restricted access to keys.

## ACCESSING AND 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 [manager@tynycornel.com](mailto:manager@tynycornel.com) and the subject matter in the email header or write to us and enclose a stamped self-addressed envelope to the address above.

The following details are also required in order to verify your identity before we can release the data:

- Full name
- Address
- Email address
- Telephone number
- Details of your previous or forthcoming stays at the Tyn Y Cornel Hotel.

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

We want to make sure that your personal Data is accurate and up to date and therefore 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, to do this please email us at [manager@tynycornel.com](mailto:manager@tynycornel.com).



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 [manager@tynycornel.com](mailto:manager@tynycornel.com) and the subject matter “Opt-out” in the email header. 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, 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.

## 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: [manager@tynycornel.com](mailto:manager@tynycornel.com) with “DELETION” in the subject line. We 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, 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 reserve.

## 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 [manager@tynicornel.com](mailto:manager@tynicornel.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.

### 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.

### HAVE A QUESTION?

Any questions on this Privacy Statement please email: [manager@tynicornel.com](mailto:manager@tynicornel.com) and the subject matter in the email header.

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Phone: 01654 782282

Company number: 03203496