

Introduction

This website is operated by Skeffington Arms Ltd Limited (potentially referenced within this policy as “we”, “us”) and we are a controller for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us when using this website in accordance with this privacy policy.

We understand that customers care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful and sensible manner. We have created this privacy policy statement in order to demonstrate our commitment to the privacy of our customers.

By using Skeffington Arms Ltd, any of our websites (including our mobile site), our mobile apps, our social media pages, our dedicated telephone reservations line, and any other Skeffington Arms Ltd service, you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this statement.

Personal information which we collect

We collect personal information about you (and others if their personal information is provided by you) when you:

- a. make or manage a booking either personally or as a guest of another guest;
- b. request a brochure or any other literature;
- c. sign up for our newsletter and other marketing emails (in line with **Marketing** below);
- d. post material to our website and / or social media page;
- e. complete customer feedback or surveys as part of your stay at one of our hotels;
- f. register at the reception or kiosks in one of our properties;
- g. raise a complaint or dispute with us or are involved in a legally recordable incident at our premises (e.g. in relation to health and safety reporting);
- h. speak to any of our representatives, call centre agents or members of our customer services or PR team;
- i. participate in competitions or promotions;
- j. and / or use our website and customer applications in any other way.

The personal information collected in the above manner may include the following about you (and others if their personal information is provided by you):

- a. full name;
- b. postal address;
- c. email address;
- d. telephone number;
- e. payment details;
- f. geo-location;
- g. machine identifiers (such as IP addresses);
- h. dispute resolution information;
- i. disability and health information;
- j. supplementary information (dietary and other preferences and special requirements);
- k. image data;
- l. behavioural data (tags and cookies – see Cookies and Tracking section below);
- m. voice recordings; and
- n. identification information (such as passports, drivers’ licences or national identity cards).

Personal information provided by third parties

We may receive information about you from other sources (such as booking.com or other third party booking engines or OTA's), which we will add to the information we already hold about you in order to help us provide our products and services in accordance with your requirements and to ensure that the quality of data we have on your account(s) is maintained properly. We may also obtain information about you from social media providers such as Twitter and Facebook or from third party websites where you have left commentary or feedback about us (for example on TripAdvisor).

We will collect personal information

1. In our legitimate interest of advertising our services, provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes (our list of services below);
 - a. Hotel Products & Services
 - b. Bar Products & Services
 - c. Nightclub Products & Services
2. carry out our obligations arising from any contracts entered into between you and us;
3. in our legitimate interest of advertising our services, provide details of any loyalty scheme or promotion; comply with legislation; and/or notify you about changes to our services.
4. in order to take the necessary steps in preparation of, or to fulfil our obligations under, a booking contract:
 - a. **Bookings and payments** – provide communications about bookings, products and services being provided to you (and others if their personal information is provided by you);
 - b. **Bookings and account updates** – send details of new, amended or cancelled bookings – usually via email;
 - c. **Update you on matters affecting your booking** – contact you (and others if their personal information is provided by you) in the event of a change that affects a booking or any data or personal information you have provided us with, such as changes to terms and conditions of booking or this privacy policy;
 - d. **Website service communication** – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);
 - e. **Customer service communication** – provide you with requested information or correspondence, or a response from us to an enquiry made by you;
 - f. **To provide assistance in completing bookings** – send reminder emails to continue with a booking which is in your “basket” on our websites or mobile app but is not paid and completed;
5. And with your consent to:
 - a. **Simplify payment process** – use saved payment cards within your account, if you set one up, so that, upon making future bookings, you have the convenient option of selecting a previously saved card in order to pay. This information is only used / accessed when you use your saved card to pay for a booking;
 - b. **Marketing communications** – create a profile about you for marketing purposes to tailor our communications to you. We may use automated processes to do this;

- c. **Promotional offers** – inform you about promotional offers and other products or services that may be of interest (in line with Marketing communications above);
 - d. **Maintain records indicating your consent to status** – to ensure we accurately reflect your wishes when communicating to you;
6. in our legitimate interest* improve our services:
- a. **Market research** – to contact you (and others if their personal information is provided by you) to ask about the experience using our hotels and services as part of a continual programme of customer service improvement. This is not marketing communication and is separate to Marketing communications above. We may use third parties for example TripAdvisor to provide such market research communications to you on our behalf;
 - b. **Website customisation** – to customise our website and its content to your particular preferences in accordance with the Cookies and Tracking section below;
 - c. **Customer support** – monitor calls and help train staff in relation to our customer support and helpdesk function;
 - d. **Product and service improvement** – to improve our product and services;
 - e. **Service analysis** – to conduct research, statistical analysis and behavioral analysis. This may include providing aggregate statistical information relating to customers, sales, traffic patterns and related site information to reputable third parties.
7. in our legitimate interest* to protect against fraud:
- a. **Website improvement and fraud prevention** – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf;
 - b. **Security** – carry out security checks when allowing you access to our services and to block fraudulent or suspected fraudulent activity.
8. in order to meet our legal obligations:
- a. **Taxation** – ensure we meet our tax and other regulatory obligations;
 - b. **Registration** – ensure local jurisdiction regulations are complied with (where registration is necessary in such jurisdictions).

* any reliance on legitimate interest shall not prejudice your interest or fundamental rights and freedoms.

Marketing

We may periodically send promotional material to you about new products, special offers or other information which we think you may find interesting based on, any information gathered, or the profile we have created, about you to the email addresses and phone numbers which you have provided.

If these are similar to products, services and bookings previously supplied by us to you, we will assume, **under our legitimate interests** to promote similar goods and services, that you are willing to receive this information unless you tell us otherwise. Please note that we do not want to send you information that you do not want to receive and you can opt out at any time (**please see 'The right to ask us to stop contacting you with direct marketing' below for further information**).

We may use your information to create a profile about you in order to tailor, by automated means, our communication and marketing to you. You can object to such profiling, please see 'The right to object to automated decision making / profiling' below).

From time to time, we may also use your information to contact you for research purposes and / or to ask about your experience using our hotels and services as part of a continual programme of customer service improvement. We may contact you by email, telephone, text, social media and / or mail. We may also use the information to customise the website according to your interests.

How long we will keep your personal information

In the event that we choose to retain your information, the length of time is determined based on the for a range of purposes for which we need to keep such information. For example (list is not exclusive):

Data	Retention Period
Recorded telephone conversations	7 days from the day of call received
For the purposes of marketing	12months from the point of last contact with you, this may include use of our websites, stays in our hotels or responses to communications with you
For compliance with legal obligations arising from contracts entered into with you, for example payment details	The length of time is determined by legal obligations arising from contracts entered into with you, which fall outside the remit of GDPR

We will remove your data from our systems at the end of the applicable data retention periods, unless we are required by current or future law to retain your personal information for a longer period.

Our approach to information security

To protect your information, Skeffington Arms Ltd has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, contractors, sub-contractors and third-party suppliers (e.g. JBM Merit or Hotsoft. This is not an extensive list) have contracts, with defined roles and responsibilities.

As stated we use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your personal data for their own purposes.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warranty the absolute security of your data when using our services.

Transfers of your information out of the EEA

We may from time to time need to transfer your personal information to support partners which are located outside the European Economic Area, for the purpose of ensuring our websites are operating correctly or in relation to third parties to whom we share your data. Any transfer of your data will be subject to adequate levels of protection that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

Your rights

In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

The right to access information we hold about you

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 days.

The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

The right to object to processing of your data

You have the right to request that Skeffington Arms Ltd stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing. On promotional emails we provide an 'unsubscribe' link at the bottom of the email which will unsubscribe you from that service.

Please note it is not possible to 'opt-out' of receiving communication from us which relates to your bookings or customer satisfaction surveys sent as part of the booking (which are not considered marketing for these purposes). This ensures that we can always contact you as a result of circumstances that may affect your stay with us and in order for us to improve our services going forward.

The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

The right to object to automated decision making / profiling

You have the right to request that we stop profiling you in relation to our direct marketing practice. You can inform us and we will deal with your request accordingly.

The right to complain

You can make a complaint to us by contacting us via datacontroller@theskeff.ie or to the data protection supervisory authority – in the UK, this is the Information Commissioner’s Office, at info@dataprotection.ie

Consent

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy.

Sharing your information

The information and data we collect is important for Skeffington Arms Ltd and we understand that you care about the use and storage of your personal information we value your trust in allowing us to do this. We would not want to share this with anyone else unless we have your express consent, we will never disclose, rent, trade or sell your personal information to any third parties for their marketing purposes.

We do disclose or transfer your data or personal information to other companies, data processors or agents employed by us to perform any necessary functions on our behalf (such as hosting and maintaining our website, providing us with data management systems, market research, customer satisfaction surveys and support services), but they are bound by similar terms to those set out in our privacy policy and may not use this information for their own purposes.

In the event that Skeffington Arms Ltd Ltd. or any part of its business is sold to or integrated with another business, Skeffington Arms Ltd Ltd may disclose your personal information to the new owners (and their professional advisers on the transaction) to be used by the new owners and their group of companies in the same ways as set out in this privacy policy, including to continue providing you with the same services and marketing information services as are currently provided by Skeffington Arms Ltd Ltd.

We may also provide aggregate statistics about our customers, sales, traffic patterns and related site information to reputable third parties in order to better understand our services, website and overall customer satisfaction which may include personally identifying information.

Use of cookies

The Skeffington Arms Ltd Ltd websites and mobile app use cookies and tags. A cookie is a small text file that can be stored by your browser on the device you use to access internet and allows

the browser to pass small amounts of information about user behavior on the given website to a web server. Tags are pieces of code that exist on web pages and collect information about usage of the web pages.

At Skeffington Arms Ltd Ltd we use our own cookies and tags as well as those from third parties to enable the smooth operation of the websites, such as the use of the basket function or to automatically log you in when you visit (with your permission). We also use cookies/tags to monitor visits to our website and continuously look for places to improve your website experience. Our marketing partners also use cookies and tags to monitor the performance of our advertising and to serve appropriate Skeffington Arms Ltd Ltd advertisements to you on other websites. We will never share any personal information about you with these third parties and the cookies and tags used maintain your anonymity.

Cookie Consent

The first time you access a Skeffington Arms Ltd Ltd website, you will be informed about our use of cookies to improve your site experience. By continuing to browse our website you consent to our use of cookies.

Description of cookies (not a complete list)

Cookie Type	Example	Details
Analytics	Google Analytics	These cookies give us critical information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users
Marketing	Awin, Doubleclick, Redeye, Uniqodo etc.	We use a number of third parties to promote Skeffington Arms Ltd Ltd. to new and existing customers. These cookies allow us to identify users sent to Skeffington Arms Ltd Ltd. site by individual third parties and meet our contractual obligations to them.

How to reject and delete cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking 'Help' on your browser. Cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each browser. Please be aware though that by rejecting cookies you may not receive the optimum website experience.

Links to other sites

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us.

Data Protection Officer

Skeffington Arms Ltd Ltd
Church Street, Athlone, Co. Westmeath

datacontroller@theskeff.ie

Changes to this Privacy Policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.