

## **PREMIER INN PRIVACY NOTICE**

This notice describes how we process your personal data.

If you book a hotel room with 'Premier Inn' or 'ZIP by Premier Inn', or a table at 'Thyme Restaurants', the controller is '**Premier Inn Hotels Ltd**'.

If you book a hotel room with 'hub by Premier Inn', or a table at 'ProvenDough Deli+Bar', the controller is '**Premier Inn Ochre Ltd**'

The address of both companies is Whitbread Court, Houghton Hall Business Park, Porz Avenue, DUNSTABLE, Bedfordshire, LU5 5XE, United Kingdom. Please see "**How do I get in touch with you**" below for contact details for specific matters.

You have the right to object to some of the processing which Premier Inn carries out. More information about your rights and how to exercise these is set out in the section headed "**Your rights**" below.

This notice applies to:

- Bookers;
- Guests;
- Visitors;
- Callers; and
- Other customers.

And anyone contacting, visiting or using our:

- Websites;
- Apps;
- Facebook Pages;
- Reservation Centre;
- Guest Relations Team; and
- Hotels and other premises.

### **Summary of the purposes for processing your personal data and the legal basis for doing so:**

- We process personal data to make, amend and administer room bookings, provide hotel services, process and store payment details and provide other products and services (such as meals and car parking). We also deal with enquires, gather customer feedback, undertake market research and direct marketing (including analysis to create profiles), in our legitimate interests to promote our business and improve our service and delivery.
- When booking with us, we don't ask for accessibility, dietary, health or other sensitive personal data. If you (or someone on your behalf) do provide such information to us, please be aware we may need to ask for your explicit consent. In some cases, it may be permissible for us to have such data as it is in your vital interests that we do so.
- On our websites we use third party marketing and analytical cookies plus similar technologies are included in our marketing emails, as explained in our <https://www.premierinn.com/gb/en/terms/how-we-use-cookies.html>. You can reject and block cookies in your browser settings.
- We monitor social media to respond to comments or complaints about our business and with the permission of the platform owner we may reproduce your comments on our website, on the lawful basis of our legitimate interests.

- In our legitimate interests, we also seek to prevent and detect crime as well as protect our business and premises.
- In order to fulfil the above purposes:
  - we disclose your personal data to payment providers, technology providers, insurers, and other specialist professional and technical service providers and advisers, to manage your bookings, arrange payments, and provide services.
  - we may transfer your personal data outside the European Economic Area (the EU Member States plus Iceland, Lichtenstein and Norway) and, where we do this, we will use safeguards to protect your data.
- We keep your data to enable us to fulfil our contract with you or to provide services, where required by law, to respond to a question or complaint, to obey rules about keeping records, to uphold or protect contractual or legal rights or where it is in your or another party's vital interests or our legitimate interests. Where we process personal data on the basis of your consent, we will retain it for as long as required for the specified purpose. We also keep your data in line with any statutory limitation periods and for tax, legal or regulatory purposes.

## Your rights

- Any consent(s) you give us may be withdrawn at any time.
- You have an absolute right to object to direct marketing (and any profiling for the purposes of direct marketing) at any time.
- You also have the qualified right to:
  - request access, rectify, and erase your personal data;
  - object to processing for any purpose where we rely on our legitimate interests as the legal basis;
  - restrict processing; and
  - supply or transfer your personal data in a portable format.

Where you exercise any of your rights, we will process your personal data to comply with your request in accordance with our legal obligations.

- Where we use automated decision-making, you have the right to human intervention, to add a statement, and to have the decision reviewed.

You have the right to lodge a complaint with the data protection supervisory authority of the country in which you are resident, work or in which your complaint arises. For the contact details of the Information Commissioner in the UK see [www.ico.org.uk](http://www.ico.org.uk), for Information Commissioner in the Isle of Man see [www.inforights.im](http://www.inforights.im) and for the Office of Information Commissioner in Jersey see <https://oicjersey.org>. Details of all EU supervisory authorities can be found at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

We may provide additional information during the booking and check-in process and at other points at which we collect your personal data.

If you wish to exercise your rights, please visit our <https://www.premierinn.com/gb/en/contact-us.html> where you will be directed to an enquiry form. Then please select “Privacy” from the “Reason for contact” drop-down box.

### Personal information we collect

We collect personal information when you book with us or request or use our services. This includes hotel and restaurant visits, using our websites or apps, or corresponding with us. We may also receive personal data about you from another source. This includes:

- **Personal Identifiers** - title, name, marital status, postal and email addresses, postcode, IP addresses and contact telephone numbers. We may also collect the names of those who are part of a group booking where necessary, and the age of children to meet your needs (e.g. to provide a cot) and enable us to confirm any restrictions that may apply to a room booking;
- **Business-to-Business Information** - for corporate customers and corporate business leads and contacts: job title, business address and business email address;
- **Transaction Information** - payment, reservation and booking details, including meals, beverages & car parking;
- **Membership information** - membership details for rewards and Premier Inn Business Account programmes;
- **Shareholder information** – where you present a Whitbread plc shareholders’ card;
- **Facebook Page Insights Data** - In relation to our Facebook Pages, we may receive Insights Data from Facebook, i.e. aggregated data that can help us to understand how visitors are engaging with our Page, which may be based on personal data collected during your visit to our Page or its contents. In relation to the processing of this personal data only, we are joint controllers with Facebook Ireland Limited. Facebook Ireland Ltd has agreed to take primary responsibility under the GDPR for the processing of Insights Data and to comply with all applicable obligations under the GDPR with respect to the processing of Insights Data, so all requests and queries should be addressed to Facebook Ireland Limited. The Page Insights Controller Addendum [\[Link\]](#) sets out our respective responsibilities and is subject to the jurisdiction of the Irish Courts and the laws of Ireland. The Irish Data Protection Commissioner is the lead supervisory authority; and
- **Customer special requests and feedback including complaints** - via call centres, emails and online free text fields.

Third parties, including where we are joint controllers, that we receive personal data from may include:

- Travel agents, booking agents, other agents, tour operators and schools;
- Corporate customers and public information sources such as Companies House;
- Comparison and review websites;
- Social networks;
- Car park operators;

- Business Account management operators;
- Market researchers;
- Marketing service providers and advertising technology providers;
- Government and law enforcement agencies;
- Other licensees in accordance with licensing requirements;
- Other hotel providers and other organisations as part of their contingency plans; and
- Whitbread Group plc and other companies in the Whitbread Group.

#### **How do we use your information, and what is the legal basis for this use?**

- **To fulfil a contract, or take steps linked to a contract. This is relevant when you want to make a reservation with us; or receive other products and services from us such as meals and includes:**
  - making, amending or administering your room booking and meal orders;
  - providing products and services requested by you;
  - verifying your identity;
  - processing payments;
  - to administer your My Premier Inn account or Business Booker Account;
  - to administer your Premier Inn Business Account;
  - communicating with you;
  - providing customer services, including managing complaints; and
  - alerting you by text, email or phone in the event of an unplanned incident, as a result of which we have to make alternative arrangements under our contract (or where we believe it is in your vital interests).

If the information we request is not provided, we may not be able to enter into or comply with a contract or our legal obligations.

- **In our legitimate interests regarding the conduct of our business, in particular:**

#### **Ensuring customer satisfaction, maintaining goodwill and dispute resolution**

- we provide technical support and investigate and process any complaints about our website or our products or services, and to maintain appropriate records for internal administrative purposes. We reserve the right to request evidence to support any claims or complaints.

**To protect our business and prevent fraud**

- monitor, test and control the performance and security of our systems, networks, processes and premises to prevent and detect fraud and protect our business;
- monitor claims/spend in relation to our Good Night Guarantee (including profiling); and
- if you provide a credit or debit card as payment, we use third parties to check the validity of your bank account or card details in order to prevent fraud.

**For business performance and improvement**

- monitor and record CCTV, call centre communications, including incoming and outgoing calls and emails for staff training, quality improvement purposes and establishing facts; and
- analyse transactions to enable us to improve our services and products and plan for our business.

**Safety & Security of our Guests and Employees**

- to protect premises and for security purposes including information recorded from CCTV;
- to monitor food safety and hygiene;
- to obtain statements from witnesses to accidents and other incidents; and
- for the detection and prevention of crime.

**Developing and Marketing Products and Services**

- for raising brand awareness;
- to understand you better as a customer by analysing your transactions and other information you provide to us or which we learn through your interactions with us;
- for marketing (including creating profiles), competitions and promotions by post, email, text and push notification where permitted to do so by law (for an alternative lawful basis, see consent below);
- we may use your data to provide personalised promotional offers to you;
- we may also use your data to provide you with personalised promotional offers on selected partner websites (for example, you might see an advertisement for our products on a partner site such as Facebook and Google);
- we also share some of your information with marketing service and ad technology providers and digital marketing networks, such as Facebook, Google, Adobe and Rocket Fuel, to present advertisements that might interest you.

For example we may transfer information about you to such providers so that they may recognize your devices and deliver interest-based content and advertisements to you.

The information may include your name, email, device ID, or other identifier in encrypted form. The providers may process the information in hashed form. These providers may collect additional information from you, such as your IP address and information about your browser or operating system; may combine information about you with information from other companies in data sharing cooperatives in which we participate; and may place or recognize their own unique cookie on your browser. These cookies may contain demographic or other data in de-identified form;

- for monitoring the use of our websites, apps and Facebook Pages in order to improve their performance, understand how people are engaging with them and optimise our media spend;
- we use personal data of some individuals to invite them to provide feedback or take part in market research; and
- for developing corporate business and applying rates.

### **Legal and Regulatory purposes**

- in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with claims, legal process or litigation);
- to comply with health and safety legislation, including accounting for the number of individuals on our premises and logging accidents;
- to prevent, investigate and/or report suspected fraud, terrorism, security incidents or other crime, in accordance with applicable law; and
- to anonymise personal data when we no longer need to process it.

Where we have relied on legitimate interests as the lawful basis for processing, we have carried out a balancing test. For details of these email [privacyofficer@whitbread.com](mailto:privacyofficer@whitbread.com).

- **Where you give us consent:**

- we will send you emails, texts and push notifications (including newsletters) in relation to products and services provided by us (for an alternative lawful basis see “legitimate interests” above), or by our named affiliates and carefully selected partners;
- when you use our websites or apps, we place cookies and use similar technologies on your computer, mobile or other device and we use such technologies such as pixel tags and web beacons in marketing emails and communications (also see our Cookie Notice);
- we may use credit checks if you apply for a Business Account;
- to participate in competitions we run and, if you win, to use your information for promotional purposes;

- we will process health information, such as dietary, accessibility, and allergy information you or a party on your behalf provides to us (we may also be able to do this where it is in your vital interests);
- when you make a donation to a charity, we will process your payment for this purpose; and
- on other occasions where we ask you for consent, we will use the personal data for the purpose which we explain at that time.

You have the right to withdraw consent at any time.

- **For purposes which are required by law:**

- to record the identity and nationality of overseas guests (excluding the Republic of Ireland and Commonwealth citizens) on check-in. These guests will be asked to complete a registration form and provide their identity card/passport details, to comply with the Immigration (Hotel Records) Order 1972, as amended. Acceptable forms of identification are: a passport, driving licence, ID card or police warrant card.
- UK;
- in response to requests by government, law enforcement authorities, or intelligence services and court orders;
- if required to comply with health and safety legislation to which we are subject;
- we may be required to share information with other licensees in accordance with local licensing requirements; and
- responding to a rights request under data protection legislation.

- **To protect your vital interests or those of another person:**

- disclosing your personal data to the emergency services where we believe it is necessary to protect your vital interests or the vital interest of another person; and
- where you (or a person acting on your behalf) provide us with dietary or other personal health data such as allergies.

**Other recipients that we disclose, transfer or share your personal data with:**

**Group companies**

We will share your personal data with Whitbread Group plc and other companies in the Whitbread Group for administering hotel and restaurant services & products. Details of the Whitbread group can be found on our corporate website at [www.whitbread.co.uk](http://www.whitbread.co.uk). The group includes Whitbread Group plc and Premier Inn Hotels Limited. Premier Inn shares data within the Whitbread group when Whitbread Group plc provide us with support, advisory, IT, safety and security, including CCTV, and other services.

When you book a hotel with us in some limited circumstances it may be provided by one of our sister companies:

- hub by Premier Inn – Premier Inn Ochre Ltd;
- German hotels - Premier Inn GmbH;
- Jersey hotels - Premier Inn (Jersey) Ltd;
- Dublin hotels - PI Hotels & Restaurants Ireland Ltd; and
- Isle of Man hotel - Premier Inn (Isle of Man) Ltd

In these cases, we will pass your booking details to the relevant company to fulfil your booking. Each of these companies use your details to provide the services and products requested with your booking and for the other purposes set out in this notice.

Premier Inn Hotels Ltd is the representative of Premier Inn (Isle of Man) Ltd and Premier Inn (Jersey) Ltd in the EU.

### **Service Providers**

For some activities Premier Inn uses third party service providers including where we are joint controllers. Your personal data will be disclosed to such organisations where this is necessary to provide a service to you, or where it is in our legitimate interests. For example, we use third parties to:

- administer bookings;
- provide Wi-Fi;
- provide parking facilities (e.g. for Sleep Park Fly);
- undertake customer feedback surveys;
- provide analytics;
- send promotional offers;
- provide personalised advertisements;
- provide insurance;
- provide IT development, support, maintenance and hosting, including the provision of applications and website hosting;
- process payments to enable you to pay by credit or debit card;
- provide credit checks and fraud checks; and
- provide CCTV systems and maintenance.

### **Other parties**

Personal data may be shared with regulators, government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim or regulatory purposes.

We disclose your personal data to payment providers, technology providers, insurers, and other specialist professional and technical advisers, to manage your bookings, arrange payments, and provide services.

With your consent, we will also disclose your personal data to Ombudsman services and Citizens' Advice.

A very small number of hotels using the Premier Inn brand are run by a franchisee partner Greene King Brewing and Retailing Limited. Your data will be shared with such franchisee where you book one of those hotels to enable them to fulfil your booking and any related services requested by you. Such franchisee is committed to protecting your privacy.

### **Restructure and sale**

We may restructure our internal group of companies so that different group companies run our hotels and related services. So, for example, in the future Whitbread Group plc (or another group company) may take



over responsibility for the running and operation of hotels from Premier Inn Hotels Ltd. If this happens we will let you know and your data may be shared with such company and processed as set out in this notice.

In the event that the business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

### **International transfers**

Sometimes we may need to send or store your data outside of the European Economic Area (the EU plus Iceland, Lichtenstein and Norway) ('EEA'). For example, to follow your instructions, comply with a legal duty or to work with or receive services from our service providers who we use to help run your accounts and our services.

If we do transfer information outside of the EEA, we will make sure that it is protected by using one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Some countries have been deemed adequate by the EU.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA or use other mechanisms and measures to achieve adequate protection. We also may use the Standard Contractual Clauses published by the EU.
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between EU countries and the US. It makes sure those standards are similar to what is used within the EEA.
- Binding corporate rules. These are internal rules adopted by group companies to allow international transfers of personal data to entities within the same corporate group located in countries which do not provide an adequate level of protection.

For some of our service providers in the US, we rely on Privacy Shield. For example the party who helps us with our customer feedback surveys. We rely on contractual measures for a small number of our suppliers who have or use offices outside the EEA and who have restricted access to some data to provide us with IT services including development, testing, support and maintenance. For further details on the mechanisms used please contact [privacyofficer@whitbread.com](mailto:privacyofficer@whitbread.com)

### **Business Account**

If you apply for a Business Account a separate Privacy Notice will also apply. Further information is available by clicking [here](#)

### **Significant automated decision-making**

Like many businesses we use business rules on financial and other information in order to detect and prevent fraud. When used, these may identify a risk and, as a result, a particular transaction may not be processed.

## **What rights do I have?**

### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent. We will continue to process your personal data for other purposes on a different lawful basis (other than consent) where that applies.

In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, and any profiling we carry out for direct marketing, at any time. You can do this by clicking on the 'unsubscribe' link located in the footer of every marketing email or text.

Where you have a relationship with another organisation, such as a social media platform like Facebook, we may ask them to send marketing to you. If you object to receiving marketing from us we will stop marketing to you. However, please contact the organisation directly if you want to object or withdraw your consent to such organisation marketing to you.

### **Other qualified rights**

- You have the right to know whether or not we process information about you and to access that information.
- You have the right to update, correct and complete any information we hold about you which is inaccurate or incomplete.
- You have the right to obtain the personal data you provide to us for a contract or with your consent in a commonly used, structured, and machine-readable format, and to ask us to share (port) this personal data to another controller.
- You have the right to ask that we erase or restrict (stop active) processing of your personal data.
- In addition, you can object to the processing where the lawful basis is our legitimate interests.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person or you ask us to erase information which we are required by law to keep. Where you object to us processing personal information we may have a compelling justification for processing it. Relevant exemptions are also included within the data protection laws that apply in the UK. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have concerns, you have the right to complain to the data protection supervisory authority of the EU Member State in which you are resident, work or in which your complaint arises. In the UK, the supervisory authority is the Information Commissioner. Details of all EU supervisory authorities can be found at:

[http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

### **How long will you retain my personal data?**

We keep your data to enable us to fulfil our contract with you or to provide services, where required by law, to respond to a question or complaint, to obey rules about keeping records, to uphold or protect contractual

or legal rights or where it is in your or another party's vital interests or our legitimate interests. Where we process personal data on the basis of your consent, we will retain it only for as long as required for the specified purpose. We also keep your data in line with any statutory limitation periods and for tax, legal or regulatory purposes.

The period for which we will retain your personal data depends on the purposes for which we are processing it and where the same personal data is processed for two or more purposes, we will retain it for the longest period. For example, we retain:

- CCTV recording for up to 31 days;
- for up to 1 year incoming and outgoing voice recordings (although we will keep a record of any consent you give us during a call for as long as we rely on it as the lawful basis for processing);
- for up to 25 months from your last stay, any personal data we process for managing your hotel or restaurant bookings;
- for up to 36 months after it is resolved, any personal data we process in relation to queries, complaints or feedback (other than market research surveys) relating to your hotel or restaurant booking;
- until a period of 3 years has elapsed since your last interaction with us, personal data we process for marketing (including profiling) purposes, unless you ask us to stop sending electronic direct marketing, in which case we will act on your request, and then keep a record of your request indefinitely;
- for 3 years in the case of accident report forms (or for accidents relating to a child, for 3 years after the child's 18th birthday);
- for up to 6 years from your last stay or access to your account, any personal data in an account you have set up with us, for example a My Premier Inn Account or Business Booker Account;
- for up to 6 years, financial and transactional data for the purposes of insights and analytics; and
- for up to 7 years, financial information for accounting, business reporting, analysis and audit purposes.

In any of the cases mentioned above, we may retain the personal data for longer, if it is required for the purposes of any internal or external investigation or litigation. In these cases, it may be retained until the matter is resolved. We may keep your data for longer in line with any limitation periods, or if we cannot delete it, e.g. for tax, legal or regulatory reasons.

You have the qualified right to request deletion of your personal data at any time, or we may choose or be obliged to erase your personal data earlier, for example, if we no longer need to process it.

### **Cookies and other similar technologies we use**

Information about the first and third parties cookies and other technologies we use is available in our [Cookie Notice](#).

## **How do I get in touch with you?**

### **Queries and exercise of rights**

If you have any queries or want to exercise any of your rights, please see the “Contact Us” page on our website and choose “Give us your feedback” to be directed to an enquiry form. Then please select ‘Privacy’ from the ‘Reason for contact’ drop down box.

### **General data protection queries**

If you have any queries about the way we process your personal data, you can get in touch at [privacyofficer@whitbread.com](mailto:privacyofficer@whitbread.com).

This Privacy Notice was last updated on 14<sup>th</sup> January 2019. Any changes to this Privacy Notice will be communicated on our website.