# Privacy Notice

Hotel Ambassadeur (1984) LTD (known as 'Hotel Ambassadeur', 'we', 'us', or 'our') is committed to protecting your privacy. This Privacy Notice explains how we collect, use, and process your personal information. We are the data controller responsible for your personal data. We comply with the Data Protection (Jersey) Law 2018 ("DPJL") and other applicable data protection legislation.

Our registration number with the Jersey Office of the Information Commissioner (JOIC) is 58959.

## The Data Protection Officer ("DPO")

We have appointed an external Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

**Email:** reservations@hotelambassadeur.co.uk
**Telephone:** +44 (0) 1534 72 44 55

## The Kind of Information We Hold 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).

Hotel Ambassadeur collects and processes personal data primarily for providing accommodation and related services to guests, managing property operations, and handling bookings.

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, last name, title, nationality, and signature.
- **Contact Data** includes your home address, email address, and telephone number.
- **Booking Data** includes information related to your reservations such as number of guests, room/bed preference, and any specific requests.
- **Financial Data** includes credit card details (processed by our payment processor) for payment.
- **Special Category Data** includes information you provide that may reveal information about your health or other protected characteristics, such as certain allergy, medical or health-related accessibility information.
- **Vehicle Data** includes car registration number (for parking or security purposes).
- **CCTV Data** includes images and video footage of you captured by the CCTV cameras operating in and around our premises, for security and crime-prevention purposes.

## Special Category Data

Special Category Data is sensitive personal information that requires additional protection under the Data Protection (Jersey) Law 2018.

Guests may voluntarily provide information such as dietary requirements, allergies, medical conditions or accessibility needs to help us provide appropriate services during their stay. Some of this information may constitute Special Category Data, depending on what it reveals about you.

We only process Special Category Data where permitted by law and take appropriate steps to protect it. Where we rely on your explicit consent, you may withdraw your consent at any time.

In an emergency, we may use relevant health information where necessary to protect your vital interests or those of another person.

## How Is Your Personal Information Collected?

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

- **Direct interactions.** You may give us your Identity, Contact, Booking, Financial, and Special Category Data by filling in forms, making a booking through our website or via telephone, email, or otherwise. This includes personal data you provide when you:
    - make a booking for accommodation or other services;
    - interact with our staff during your stay;
    - give us feedback or contact us.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
    - Booking and Identity Data from online travel agencies, when you make a reservation through their platforms.
- **CCTV.** We operate CCTV cameras in and around our premises (such as entrances, car parks, and communal areas) for the security and safety of our guests, staff, and property. If you visit or stay with us, your image may be captured by these cameras.

## How We Will Use Information About You

Hotel Ambassadeur will only use your personal data where permitted by law. We use your information to provide our services, manage our business and meet our legal and regulatory obligations.

We may process your personal data on the following legal bases:

- Where we need to perform a contract we have entered into with you or take steps at your request before entering into a contract. For example, to manage your booking, provide accommodation and related services, process payments and respond to your enquiries.
- Where it is necessary for our legitimate interests, provided that your interests and fundamental rights do not override those. For example, to manage our business, maintain records, recover debts and protect the safety and security of our guests, staff and premises, including through CCTV.
- Where we need to comply with a legal obligation. For example, to meet legal or regulatory requirements and respond to lawful requests from authorities.
- Where you have given your consent. This applies where you have specifically agreed to us processing your personal data for a particular purpose. Where we rely on your explicit consent, you may withdraw your consent at any time.
- Where it is necessary to protect your vital interests or those of another person. For example, in an emergency where processing is necessary to provide medical assistance or protect someone's life.

## Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Data Sharing

Hotel Ambassadeur may share your personal information with trusted third-party service providers, known as processors, who perform functions on our behalf. These processors are contractually obliged to protect your data and only process it according to our instructions and the requirements of the Data Protection (Jersey) Law 2018.

| Processor | Description of processing | Link to Privacy Notice |
|---|---|---|
| Room Master | Booking/Property Management System | Privacy Policy |
| Smarter Payments | Payment processing | Privacy Policy |
| Microsoft Outlook | Email communication | Privacy Statement |
| Nitel | CCTV provider and IT Support | |

## Other Controllers You May Share Your Data With

Where you make a booking with us through an online travel agency, that online travel agency is not our processor. It independently determines how and why it processes your personal data, and acts as a separate data controller in its own right, under its own privacy notice. We are not responsible for how these organisations use your personal data once they hold it. We encourage you to review the relevant online travel agency's privacy notice, usually available on its own website, for further information about how it processes your data.

## International Data Transfer

We do not directly transfer your personal data outside Jersey, the UK or the EEA. However, some of our service providers may process personal data outside these areas. Where this occurs, we will ensure that appropriate safeguards are in place as required by applicable data protection law.

## Data Security

Hotel Ambassadeur is committed to protecting the personal information you share with us. We implement appropriate technical and organisational measures to safeguard your data against unauthorised or unlawful processing, accidental loss, destruction, or damage. These measures include, but are not limited to, access controls, regular security assessments, and staff training.

While we strive to protect your personal data, no security system is impenetrable, and we cannot guarantee the absolute security of our databases. We have procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Data Retention

We keep your personal data only for as long as necessary to provide our services and meet our legal, accounting and regulatory requirements.

We regularly review the personal data we hold and securely delete or dispose of it when it is no longer needed.

For example:

- **Guest registration cards** are retained for 12 months and then securely destroyed by shredding.
- **CCTV footage** is retained for 30 days and then automatically overwritten or deleted, unless it needs to be kept for longer for an ongoing investigation, legal claim, or request from law enforcement or a regulatory authority.

We may retain certain information for longer where required by law or where necessary to protect our legal rights.

## Data Protection Rights

Under the Data Protection (Jersey) Law 2018, you have specific rights concerning your personal data. These include:

- **Right to be informed:** You have the right to be informed about the collection and use of your personal data. This privacy notice serves to fulfil that right.
- **Right of access:** You have the right to request access to the personal data we hold about you. This is commonly known as a "data subject access request." This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to rectification:** You have the right to request that any inaccurate or incomplete personal data we hold about you be corrected.

- **Right to erasure (the "right to be forgotten"):** You have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing. This is not an absolute right and applies in specific circumstances.
- **Right to restrict processing:** You have the right to request the restriction of processing of your personal data in certain situations, for example, if you contest the accuracy of the data.
- **Right to data portability:** You have the right to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format, and you have the right to transmit that data to another controller without hindrance from us, where the processing is based on consent or contract, and is carried out by automated means.
- **Right to object:** You have the right to object to the processing of your personal data in certain circumstances, including where processing is based on legitimate interests or for direct marketing purposes.
- **Rights in relation to automated decision-making and profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except in specific situations.

## How to Request Your Information

To exercise any of your data protection rights, your primary route is through our Data Rights Portal. This portal allows you to submit requests for access, rectification, erasure, restriction, portability, and objection directly and securely.

Alternatively, you can contact our Data Protection Officer:

Email: reservations@hotelambassadeur.co.uk
Telephone: +44 (0) 1534 72 44 55

We will respond to your request within four weeks of receiving it. Where permitted by law, this period may be extended by up to a further eight weeks if your request is complex or if you have made multiple requests. We will inform you within the initial four-week period if an extension is necessary.

We may need to request additional information from you to verify your identity before responding to your request. This is a security measure designed to ensure that personal data is not disclosed to anyone who is not entitled to receive it.

We may also contact you if we require further information or clarification about your request. Providing this information may help us process and respond to your request more efficiently.

## Right to Withdraw Consent

Where we are relying on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent. To withdraw your consent, please use our Data Rights Portal or contact us directly using the details provided in the "How to Request Your Information" section.

## Automated Decision-Making

We do not use automated decision-making or profiling in relation to your personal information.

## Changes to this Privacy Notice

Hotel Ambassadeur may update this Privacy Notice from time to time to reflect changes in our data processing practices, legal requirements, or new technologies. We will publish the updated Privacy Notice on our website. We encourage you to review this Privacy Notice periodically to stay informed about how we are protecting your personal data.

## Complaints

If you have any concerns or complaints about how Hotel Ambassadeur processes your personal data, please contact us in the first instance. We take all complaints seriously and will do our best to resolve them for you.

**Contact details for Hotel Ambassadeur:**
Data Protection Officer
Hotel Ambassadeur
St Clements Bay, Jersey, JE2 6SB
Email: reservations@hotelambassadeur.co.uk
Telephone: +44 (0) 1534 72 44 55

If you remain dissatisfied with our response, you have the right to lodge a complaint with the supervisory authority in Jersey:

**Jersey Office of the Information Commissioner**
2nd Floor, 5 Castle Street
St Helier, Jersey, JE2 3BT
Telephone: +44 (0) 1534 716530
Email: enquiries@jerseyoic.je
Website: jerseyoic.org