



PRIVACY POLICY

WHO WE ARE

We are Hotality IT Solutions Ltd (registered in England and Wales under company registration number 10464922) and are the controller and responsible for your personal data (collectively referred to as "Hotality", "Company", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Our contact details are:

Data Protection Officer
Hotality IT Solutions Ltd
Unit R Loddon Business Centre
Roentgen Road
Basingstoke
RG24 8NG

Email address: privacy@hotality.co.uk

COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact our Data Protection Officer (details above) in the first instance.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THE DATA WE COLLECT 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).

We may collect different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes postal addresses, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes 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 our websites.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We 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 policy.

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.

HOW IS YOUR PERSONAL DATA COLLECTED?

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

Direct interactions

You may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback
- register for an event or download;
- apply for a job.

Interactions with our Partners

Where you submit personal data to one of our reseller or referral partners and that information needs to be passed through to us to provide a product/service for your usage, we will solicit and retain that data. We will also collect submitted personal information from our partners where you have expressed an interest in our products/services or company. Reseller partners that provide our Services to you, may also share with us personal information that we require to provide the Services to you.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive data about you if you visit other websites employing our cookies.

Service Interactions

As you interact with our Services/Products, certain personal information may be collected such as unique device ID's, device IP addresses, login information (username and password), one-time passcodes, security question answers and user location.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - (a) analytics providers [such as Google based outside the EU];

- (b) advertising networks based inside the EU; and
- (c) search information providers based inside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
- Identity and Contact Data from data brokers or aggregators based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register
- Identity and Contact Data from reseller partners to whom you have provided such personal data.

FOR WHAT PURPOSE WILL WE USE YOUR PERSONAL DATA?

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation;
- To assess your suitability for employment and process your application;
- To send you materials that you request such as brochures and data sheets;
- To register you for an event;
- For analytical purposes including to understand how visitors to our websites move around, what content they access in order to tailor content to specific users;
- For customer support and training;
- To solicit feedback;
- To support testimonials that you have provided or other marketing activity that you have agreed to participate in
- For marketing communications;
- To identify devices used in conjunction with our products and services;
- To enable single-sign on features within our products and services;
- To enforce security features within our products and services;
- To verify identity, particularly when requesting changes to services/products.

LAWFUL BASIS FOR COLLECTION OF YOUR PERSONAL DATA

We shall ensure that we have a lawful basis for collection of personal data, namely either:

- Where we need it to perform a contract we are about to enter into, or have entered into, with you;
- Where we need to comply with a legal or regulatory obligation;
- Where it is necessary for our legitimate interests, including, but not limited to: keeping our records updated and to study how customers use our products/services/websites, to define types of customers for our products and services, to keep our website updated and relevant,

to develop and grow our business, to inform our marketing strategy, to develop our products/services, running our business, provision of administration and IT services, network security, to prevent fraud and/or assess whether to enter into a contract with you; or

- Where you have given consent.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can request the removal of your details from our marketing systems or update your marketing preferences at any time by contacting privacy@hotality.co.uk. We will respond to your request within one (1) month. We will retain your personal data for non-marketing purposes provided we continue to have a lawful basis for doing so.

PROMOTIONAL OFFERS FROM US

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when registered for an event, webinar or download and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes.

COOKIES AND CLEAR GIFS

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. We also employ a software technology called clear gifs, that help us better manage content on our website by informing us what content is effective.

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 new purpose is compatible with the original purpose, please email privacy@hotality.co.uk.

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.

DISCLOSURES/SHARING OF YOUR PERSONAL DATA

We may need to disclose/share your personal data with the parties set out below for the purposes set out above.

- Our customer relationship management software providers, marketing automation platform providers, webinar software providers, email platforms, Web site hosting providers, partners, our customer success software provider, our online community platform provider, our learning management system software provider and members of our partner programs;
- our human resources information system provider and our background check service providers;
- analytics providers (Usage Data only);
- our customer reference management software provider;
- our payment processing providers;
- our enterprise resource management software provider;
- our customer success software provider, survey tool service providers, calendar scheduling tool providers and learning management system software provider;
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy;
- professional advisers including lawyers, bankers, auditors and insurers based in the UK and/or EEA;
- HM Revenue & Customs, regulators and other authorities in the UK and/or EEA;
- our business and channel partners but only if:
 - (i) you specifically opt in to such sharing via an information request or an event registration form; or
 - (ii) you attend a company event and have your attendee badge scanned by a business/channel partner. If you do not wish for your information to be shared in this manner, you may choose not to opt in via information request or event registration forms and elect not to have your badge scanned at company events.
- If you choose to share your information with channel/business partners in the manners described above, your information will be subject to the channel/business partners' respective privacy statements. We require all third parties to respect the security of your personal data and to 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.

We also reserve the right to use or disclose information provided if required by law or if we

reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud and/or to comply with a judicial proceeding, court order, legal process or other governmental authority; provided, however, that unless prohibited by law, we will use its reasonable efforts to give you notice to enable you to seek a protective order or take other appropriate action.

INTERNATIONAL TRANSFERS

Some of the third parties that we may share your personal data with could be based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, perform an Internet search for "European Commission: Adequacy of the protection of personal data in non-EU countries".
- Where we use certain service providers, we may use specific contract terms approved by the European Commission which give personal data the same protection it has in Europe. For further details, perform an Internet search for "European Commission: Model contracts for the transfer of personal data to third countries".
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see "European Commission: EU-US Privacy Shield".

DATA SECURITY

We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WILL WE HOLD YOUR PERSONAL DATA FOR?

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 unauthorised 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.

We keep information on unsuccessful employment applications for six (6) months in case another alternative role becomes available that we think you may be suitable for.

We keep prospective customer data for which we obtained explicit consent for twelve (12) months after which time we will seek to renew consent.

We keep Usage Data indefinitely as this is always relevant to product/service development.

We keep basic personal data and financial information about our customers for the duration of your business relationship with us and thereafter as required for legal and audit purposes.

We retain testimonials until withdrawn at your request.

We retain personal information linked to service support requests indefinitely because historical data about service issues is always relevant to service development.

In some circumstances you can ask us to delete your data. Please contact privacy@hotality.co.uk with any requests.

In some circumstances we may anonymise 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.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, such as:

Request access to your personal data (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.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those

of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer (see contact details above).

NO FEE USUALLY REQUIRED

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. Where we refuse to respond to a request, we will provide a written explanation of why to the individual, informing them of their right to complain to the supervisory authority without undue delay and at the latest within one month.

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.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you by email and keep you updated.