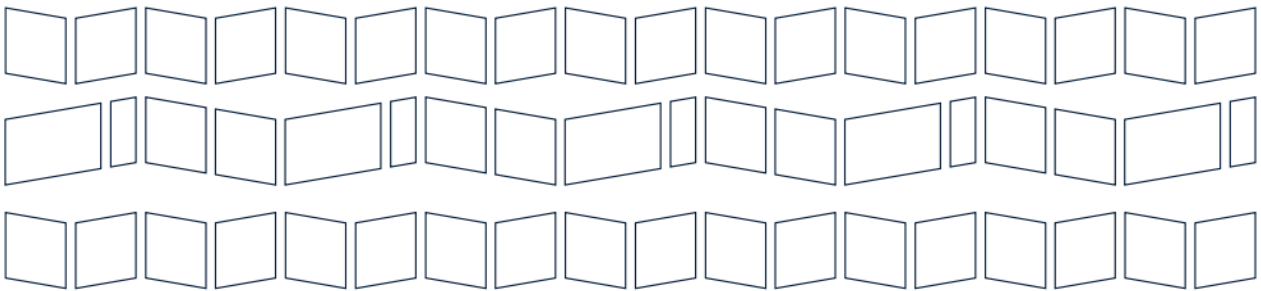


Privacy Notice



Note:

As the law is constantly changing, the policies are subject to be reviewed, and the company reserves the right to amend them accordingly without prior notice.

Confidentiality and Intellectual Property Rights

This document is classified as Confidential and remains the property of Imperial London Hotels.

Revision History

Version	Revision Date	Revised by	Section Revised

Document Control

Document Owner:	Document No:	Status:	Date Approved:
Security Classification:	Next Review Date:	Version: V1.0	Department:

Privacy Notice

Imperial London Hotels Limited ("ILH/we/us/our") is committed to protecting and respecting the privacy of any personal data that you provide to us. This privacy notice is issued on behalf of Imperial London Hotels Limited's group, therefore any mention of "Imperial", "we", "us" or "our" in this privacy notice is to include the relevant company in the Imperial group responsible for processing your data. Imperial London Hotels Limited is the controller and responsible for our website and our mobile app.

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website (including our mobile site) and our mobile app, including any data you may provide through either when you sign up to our newsletter, purchase a product or service or take part in a competition organised by us.

Whilst our website and our app are not intended to be used by children, there may be situations whereby we collect the personal data of a child (i.e. where a child makes use of our digital key feature via our app). If this is the case, we will ensure that an appropriate lawful basis for processing their data applies and appropriate security measures are in place.

How we use your personal data

We will collect personal data in the following ways:

- When you provide your contact details to our sales department requesting information about our service or to request a demonstration, by telephone, e-mail or via our website.
- When you provide your contact details to our marketing department requesting relevant and useful information about our service through lead generation submission forms, by telephone or e-mail.
- When you provide your contact details to our marketing department requesting information about our service through an exhibition/event, networking meetings or targeted research.
- When you apply for employment at ILH.

Personal data we may collect

The personal data we routinely collect includes:

- Title, Full Name, Role
- Organisation Name
- Telephone
- E-mail address

If you are applying for a position at ILH, we will collect your CV which will include some or all of the below:

- Title, Full Name

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- Education Details
- Work Experience
- Telephone
- E-mail address

With regard to each of your visits to our website we will automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page.

How we use Your Personal Data

This section explains how and why we process your personal data, as well as the legal basis on which we carry out this processing.

Communications: sending communications related to ILH, keeping a record of your relationship with ILH including ensuring we know how you prefer to be contacted.

- The legal basis for such processing is your **consent**.

Information and services: providing you with information and access to services that you have requested from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes.

- The legal basis for such processing is for the **performance of a contract or agreement**, yet you may opt-out for some communications.

Enquiries: providing you with information about our services that you have requested from us via exhibitions/events, networking where we identify you as a prospect.

- The legal basis for such processing is our **legitimate interests**.

Job applications: processing applications for a position at ILH.

- The legal basis for such processing is your **consent**.

Confidentiality and Security

ILH will store your data safely and, therefore, ILH maintains appropriate technical and organisational measures to protect against unauthorised or unlawful processing of Personal Data and/or against

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accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to your Personal Data. To try to prevent unauthorised access, maintain data accuracy and ensure the correct use of information ILH maintains physical, electronic, standard security practices, including encryption, passwords and physical security measures, and managerial procedures to protect the security and confidentiality of Personal Data. Only a limited number of persons within our organisation are authorised to access, delete or modify your data. These measures are aimed at ensuring the on-going integrity and confidentiality of Personal Data. ILH evaluates these measures on a regular basis to ensure the security of processing.

ILH's employees or any of ILH's contractual partners who have access to your data in order to provide ILH (eg. its online domain/website hosting supplier, database software supplier) are contractually obliged to keep such information in confidence and may not use these data for any other purpose than performing their contractual missions for ILH.

How we share information with others

ILH won't transfer personal data about you to third parties for the purpose of providing or facilitating third-party advertising to you. We won't sell personal data about you to a third-party.

We may transfer your personal data with third parties in some circumstances, including:

1. Our group companies
2. Banks and payment providers, to authorise and complete payments
3. Service providers who work with us to help provide our services
4. Companies to whom we transfer or may transfer our rights and duties under our agreement with you
5. Any successors in title to our business
6. Other agencies, law enforcement or governmental organisations where we are required to make such disclosures by applicable law

We may share personal data with relevant payment providers to supply evidence of guest stays at our hotel when required to manage and resolve chargeback requests. This processing is based on our legitimate interests in protecting the business from financial disputes and ensuring effective transaction management.

Retaining your personal information

ILH will retain your Personal Data in accordance with applicable legal requirements, and only for as long as necessary or as long as required by law, for the purposes described in this Notice.

ILH will retain your Personal Data as follows:

- **Communications:** Personal Data will be kept for 7 years from the date.
- **Information, enquiries and services:** will be kept for 7 years from the date.
- **Job applications:** will be kept for 7 years from the date.

Your Rights

You have the right to withdraw your consent to the processing of your Personal Data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To the extent required by applicable law and subject to legal limitations, you have the right:

- **Your right of access** – You have the right to ask us for copies of your personal data.
- **Your right to rectification** – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right of erasure** – You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict processing of your information in certain circumstances.
- **Your right to object to processing** – You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

Changes to this policy

Any changes we may make to this policy in the future will be posted on our website (<https://www.imperialhotels.co.uk/privacy-policy>) and, where appropriate, notified to you by email.

Please check back frequently to see any updates of changes.

Contact Us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPM using the following details:

Email address: privacy@imperialhotels.co.uk

Postal address: 38-51 Bedford Way, London, WC1H 0DG

How to complain

In particular, ILH is committed to working with you to obtain a fair resolution of any complaint or concerns about privacy. If, however, you believe that ILH has not been able to assist with your

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complaint or concern, you have the right to make a complaint to the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113