



# General Data Protection Regulations

2<sup>nd</sup> August 2022. Version 4

## PURPOSE

To ensure compliance with General Data Protection Regulations, taking effect as from 25<sup>th</sup> May 2018. To establish the following:

- Who is the Data Controller?
- What data do we receive?
- What data is stored?
- Where data stored?
- Who has access?
- For what purpose is data stored?
- For how long is data stored?
- How is consent to use data obtained?
- How is request for information handled?
- How is data deleted?
- What control measures are in place?
- What is procedure to report potential breach?

The document is deemed correct at the date of production, and will be reviewed when changes in legislation, procedures, and/or suppliers may so require. For the purpose of accuracy, the document will only be considered implemented when clearly marked as such.

## WHO IS THE DATA PROTECTION OFFICER (DPO)?

The post of Data Protection Officer (DPO, is responsible for the day-to-day management of Data Protection, ensuring compliance to this document. The CEO is ultimately responsible to ensure that the Company is compliant with legislation as appropriate.

The DPO is: Erika Vinsentin-Bonomo, [Erika@sphg.co.uk](mailto:Erika@sphg.co.uk)

The CEO is: Antonio Megaro, [antonio@sphg.co.uk](mailto:antonio@sphg.co.uk)

## WHAT DATA DO WE RECEIVE?

### GUESTS

1. Name
2. Address
3. Email
4. Telephone number
5. Passport details (if non-UK resident)
6. Credit Card details (tokenized details ONLY)

### TEAM MEMBERS

1. Name
2. Address
3. Email
4. Telephone number
5. Passport/ID card details



6. Bank Details
7. Next of Kin Name
8. Next of Kin Telephone number

#### KX CLUB

1. Name
2. Address
3. Email

### WHAT DATA IS STORED?

#### GUESTS

1. Name
2. Address
3. Email
4. Telephone number
5. Passport details (non-UK residents only)

#### TEAM MEMBERS

1. Name
2. Address
3. Email
4. Telephone number
5. Passport/ID card details
6. Bank Details
7. Next of Kin Name
8. Next of Kin Telephone number

#### KX CLUB

1. Name
2. Address
3. Email

### WHERE IS DATA STORED?

#### GUESTS

- Property Management System - Guestline
- Revinate Marketing Tool
- Open Table

#### TEAM MEMBERS

- Sage Payroll
- Corporate Server located In Derbyshire House Server Room

#### KX CLUB

- Revinate Marketing Tool



## WHO HAS ACCESS?

### GUESTS

- Employees of Guestline and Online Travel Agents\*
- Current team members of St Pancras Hotels Group Ltd, restricted to;
  - Front Office Team
  - Cluster Hotel Manager
  - Housekeeping Manager/Assistant Manager/Supervisor
  - Director of Food & Beverage
  - Events Coordinator/s
  - HR Business Partner
  - Group Marketing Executive
  - Group Revenue Manager
  - Group Accounts Manager
  - Chief Executive Officer
  - Bar & Restaurant Staff (name and email ONLY)
- Employees of Revinate (name and email ONLY)
- Employees of DigiNow (name and email ONLY)
- Employees of Open Table (name and email ONLY) \*

**NOTE** – No other organisations or people have access to Credit Card details than Elavon and Windcave. This includes team members of SPHG.

\* Details are provided to SPHG Ltd via the supplier, who is collecting the data and store the data outside of our control.

### TEAM MEMBERS

Current team members of St Pancras Hotels Group Ltd, restricted to.

- Group Accounts Manager
- HR Business Partner
- SAGE

### KX CLUB

- Revinate
- DPO
- Group Sales Manager
- Group Marketing Executive
- DigiNow

## FOR WHAT PURPOSE IS DATA STORED?

### GUESTS

- To ensure reservations of facilities can be made
- Pre-arrival confirmation of reservations
- Compliance with legislation
- Marketing purpose to drive guest loyalty

### TEAM MEMBERS

- To ensure compliance with legislation



- To ensure payments can be made to employee

#### KX CLUB

- Marketing purpose to drive guest loyalty

### FOR HOW LONG IS DATA STORED?

#### GUESTS

- Indefinite, until such date guest requests to remove their details, unless in contradiction with legislation.

#### TEAM MEMBERS

- Throughout employment with SPHG Ltd and associated companies, and until such date so required by legislation.

#### KX CLUB

- Indefinite, until such date guest requests to remove their details, unless in contradiction with legislation.

### HOW IS CONSENT TO USE DATA OBTAINED?

#### GUESTS – HOTEL/RESTAURANT/EVENTS

- Via reservation systems such as Guestline, and/or Online Travel Agents. Details are entered by the guest themselves.
- When arriving at property, without reservation. Details provided by guests and entered by SPHG Ltd team members into approved reservation system ONLY.

#### TEAM MEMBERS

- Through application process for employment with SPHG Ltd and associated companies.

#### KX CLUB

- By application to membership via website hosted by SPHG Ltd.
- Through manual application on our premises, using approved forms which include name, email, and company ONLY.

### HOW IS REQUEST FOR INFORMATION HANDLED?

- All requests for information are addressed to the DPO.
- Only requests provided in writing will be considered.
- All requests will be responded to within relevant timeframe, as stipulated by legislation in force at the time of request.
- In the unlikely event that a DPO is not available to respond within the timeframe as stipulated by current legislation, the Chief Executive Officer will appoint a suitable interim DPO, whom will act within directive as stipulated in this document.
- Request for data will only be accepted by the person whom the data will relate to, unless specifically instructed by a responsible authority, supported by legally binding instructions in writing.



## HOW IS DATA DELETED?

Data is deleted by the DPO, who will have full access to all Data Bases stored at premises controlled by St Pancras Hotels Group Ltd. All requests for data deletion will happen within a reasonable timeframe, and it is endeavoured that this time frame will not exceed 30 days from request. However, should the request to have data deleted contradict legislation of England and Wales, or instructions by responsible authorities, data will remain on files until instructed by aforementioned.

## WHAT CONTROL MEASURES ARE IN PLACE?

All data access is controlled by the following tangible measures.

- Data access is restricted to positions, as defined in this document.
- On-site servers are kept in access-controlled areas.
- Remote access to servers is restricted to appointed IT consultants only.
- All on-site storage of data is kept on the servers, and not on individual workstations.
- Ability to copy data base files is restricted to DPO only.
- User Passwords are programmed to change every 90 days.
- All third-party business partners who keep data of guests and/or associates, are requested to provide GDPR Policies and confirmation of GDPR Compliance prior to engagement. This data is reviewed annually, or when legislative changes so require.

## WHAT IS PROCEDURE TO REPORT POTENTIAL BREACH?

If a suspected breach takes place, all individuals who have been identified to may have been affected by a breach, will be contacted within 24 hours of SPHG Ltd, DPO and/or Third-Party Business Partner has been made aware that a potential breach has/may have taken place.

This communication will be done via email as far as reasonably possible. SPHG Ltd reserves the right to issue a formal statement using other channels, should the Company deem that being a better or swifter option.

## BUSINESS PARTNERS

Details listed below are correct as when this document was created. Any changes will be recorded on this document but will not stipulate the requirement of a revision to be issued.

- NETTEAM IT CONSULTANTS
- REVINATE
- GUESTLINE
- HRS
- BOOKING.COM
- OPEN TABLE
- EXPEDIA
- LASTMINUTE.COM
- LATEROOMS.COM
- MAILCHIMP
- SAGE



- DIGINOW
- HOTEL BEDS
- JAC TRAVEL
- CTRIP

## REVIEW OF THIS DOCUMENT, AND AMENDMENTS.

This document took effect 22<sup>nd</sup> May 2018 and will be reviewed when legislation so require. Responsible person to undertake reviews is the DPO, or suitably appointed person and/or organisation. The ownership of this document is restricted to St Pancras Hotels Group Ltd, and any associated organisation owned or operated by St Pancras Hotels Group Ltd.

Version 1	Christian Kaberg, Group Operations Director For and on behalf of SPHG Ltd	5 <sup>th</sup> May 2018.
Version 2	Christian Kaberg, Group Operations Director For and on behalf of SPHG Ltd	13 <sup>TH</sup> July 2019.
Version 3	Christian Kaberg, Managing Director For and on behalf of SPHG Ltd	28 <sup>th</sup> Dec 2021
Version 4	Christian Kaberg, Managing Director For and on behalf of SPHG Ltd	2 <sup>nd</sup> Aug 2022