

General Data Protection Regulation (GDPR)

BEST WESTERN PLUS HOTEL CITY COPENHAGEN

24/05/2018

PRIVACY POLICY

This Privacy Policy describes how Best Western Plus Hotel City Copenhagen, (operated by Copenhagen City Hotel ApS, CVR number 39496895,) hereafter referred to as BWPHCC, process your Personal Data. Personal Data is any information with which one can, directly or indirectly, identify a physical person. Please read this Privacy Policy carefully to understand how, and for what purposes, we process your Personal Data.

We process your Personal Data when you use our services. We care about your privacy and comply with applicable law aiming to protect you as an individual. This Privacy Policy describes the foundation of how we process Personal Data you share with us, or that we collect when you use our services. For some of our services, specific terms and conditions may apply that you need to accept prior to using the service.

We aim to maintain a high level of protection of data integrity. BWPHCC processes Personal Data mainly to administer, provide, develop and maintain the services, handle your bookings, optimize your experience of the services and to communicate with you.

If we make changes to this Privacy Policy, we will notify customers through our website on this link.

If you provide us with Personal Data concerning other persons, you are responsible for ensuring that BWPHCC has permission to process that Personal Data in accordance with this Privacy Policy.

PERSONAL DATA

BWPHCC only processes your Personal Data in accordance with applicable law.

BWPHCC may collect Personal Data directly from you when you use our service (for instance when you book a hotel room). We may also receive and transfer your Personal Data from and to companies within Best Western International, hereafter referred to as BWI, or our partners (e.g. if you have used a travel agency to book a hotel room). We use different means to collect your Personal Data, some of which include cookies, guest surveys and customer service. Depending on what service you use, the means of collecting and the purpose of processing may vary.

Processing of Personal Data

BWPHCC will process your Personal Data for the purposes outlined below and the purposes described to you when you use a specific service.

If you book a hotel room, a meeting room or other services with BWP HCC, we will process your Personal Data in order to provide the service, secure the room, administer, follow up and obtain payment for your booking. This includes processing in order to confirm your booking and remind you when you are to stay with us.

If you are a member of our **BWI Rewards** loyalty program, when you book a hotel room with us, your Personal Data will, subject to your permission, be saved in the reward profile. If you are not a member of BWI Rewards, but wish to become a member, your Personal Data will be used to create a membership profile. Read more about how your Personal Data is processed in BWI Rewards in the terms and conditions.

<https://www.bestwestern.dk/terms-and-conditions>

You are required to provide the details we request in order for us to handle your reservation. It is optional for you to provide us with details about your BWI Rewards membership number.

If you book a room on someone else's behalf, you are responsible in relation to us, for having their consent to the processing of their Personal Data in accordance with this Privacy Policy.

Personal Data:

- Identity related data, such as a name
- Contact details, such as email address, telephone number, postal address
- IP-address (if you book on our website)
- Preferences and other requests or needs
- Sensitive personal data regarding, for instance health, (e.g. if you specifically book room adapted to disabled guests)
- If applicable, your BWI Rewards membership number
- Other data you provide when making a booking (e.g. regarding persons you travel with)

Legal basis for processing:

- The processing is necessary in order for us to fulfil our agreement with you.

The retention period is 364 days after the end of your stay, unless you are a member of BWI Rewards, in which case your booking details are saved in your membership profile. To ensure that your Personal Data is saved next time you make a booking, you can apply for BWI Rewards membership.

Newsletters and other direct marketing are processed by BWI Rewards and Best Western Hotels & Resorts and only if you have agreed to receive newsletters and information.

If you do not wish to receive newsletters or to be part of BWI Rewards, please contact <https://www.bestwestern.dk/>

If you are a member of BWI Rewards, your Personal Data may be used to refine your membership profile. If you are not a BWI Rewards member, we may, subject to your permission, use your Personal Data to create a membership profile for you.

Retention period is until you withdraw your consent of the processing.
Retention period is in accordance with national law.

Customer inquiries

We may process your Personal Data in order to respond to, assist, follow up and handle your customer service inquiry. This includes any communication necessary in order for us to respond to questions you have submitted to us via telephone, email, social media or other communication channels. We may also process your Personal Data in order to handle complaints or support inquiries, including technical support.

Development and assessment of our services, products and systems

We may process your Personal Data to adapt, develop and maintain our services in order to improve user-friendliness, product and service range and quality and efficiency from an environmental and sustainability perspective. We may also process your Personal Data in order to diagnose errors, optimize technology and improve our IT systems.

We analyze the data we collect about you, by means of our analytics tools on our website. The analysis is anonymized and is carried out in an aggregated form. The information from the analysis can never be connected to a specific person. The analysis helps us develop our IT systems, website and product and service range.

Retention period is for a maximum of 38 months from collection.

Personal Data Retention

Your Personal Data is retained as long as it is necessary in order for us to fulfill the purposes of our processing. Thereafter we will, in a secure way, delete or anonymize your Personal Data to the extent that it is no longer possible to identify you, or know that the data relates to you.

BWPHCC deletes Personal Data in accordance with applicable law and the criteria outlined above. This means that BWPHCC deletes or anonymizes your Personal Data when the Personal Data is no longer required for the purpose of processing.

Suppliers

We may use other companies to fulfil our obligations to you. To that end, we will share your Personal Data, or transfer your Personal Data, to companies that provide services to BWPHCC, including, but not limited to, our suppliers providing customer service,

delivery services, analyzing services and communication and marketing services. BWPHCC may also share your Personal Data with our suppliers providing hosting, storage, technical support and maintenance of our IT solutions. Furthermore, we may transfer your Personal Data to our payment service providers who provide us with payment solution services in order to facilitate your payment to us. Our suppliers only process your Personal Data in accordance with our documented instructions and may not use your Personal Data for their own purposes. They are also required by law to protect your Personal Data from unauthorized access and similar.

Other recipients

In certain circumstances, we may transfer your Personal Data to other recipients than those outlined above if it is necessary in order for us to fulfil the purposes outlined below.

- Public authorities: We will transfer Personal Data to public authorities if we are required to do so by law. This only occurs when necessary for compliance with a legal obligation.
- Debt collectors: If you do not pay your debt we may transfer your Personal Data to a debt collection agency in order to collect your debt. The processing is necessary to protect our interests.
- Courts, appellant/appellee or similar: If there is a trial or similar, we may transfer your Personal Data to the court, public authority or appellant/appellee in order to protect our interests. The processing is necessary for our legitimate interest of being able to defend ourselves or protect our interests.
- Re-organization, merger or acquisition: If BWPHCC re-organizes its organization or for other reasons sells parts or the entirety of its business to a third party, your Personal Data may be transferred together with the business. The processing is necessary in order to fulfil our legitimate interest of selling the business, merge or be acquired.

BWPHCC has implemented appropriate technical and organizational measures to protect your Personal Data against for instance, loss, manipulation and unauthorized access. We continuously adapt our security to new technology in order to maintain high security levels.

Third Party applications/websites

BWPHCC services may contain links to other applications and/or websites over which BWPHCC has no control. This Privacy Policy is only applicable to you if you use BWPHCC's own services. BWPHCC is not responsible for the content of any linked applications or websites and the processing of Personal Data that may be undertaken by the owner or operator of the linked applications or websites.

Cookies

BWPHCC uses cookies as part of its digital services. The cookies may, in some cases, automatically collect Personal Data (such as IP address and online behavior). We use cookies to improve your user experience and the security of our digital services.

Rights

Privacy law gives you several rights in relation to our processing of your Personal Data. If you would like to exercise these rights, please contact BWPHCC by telephone on + 45 33130666 and speak with the receptionist and they will assist you, or send an email to hotelcity@hotelcity.dk

Access to your Personal Data

You have the right to obtain from us a confirmation as to whether we process your Personal Data along with information about the processing and your associated rights, a so-called Subject Access Request.

Request for rectification

If you think that certain Personal Data that we process concerning you is incorrect or incomplete, you have the right to request rectification. In order for us to change the Personal Data, you need to contact us. BWPHCC cannot be held responsible for problems caused by your Personal Data being incorrect if you have omitted to inform us thereof.

Withdrawal of consent

To the extent that we process your Personal Data based on your consent, you may at any point in time withdraw your consent to the processing. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to the withdrawal.

Objection to processing for the purposes of direct marketing

You have the right to object to processing your Personal Data for the purpose of direct marketing. You can opt-out from BWPHCC's Facebook page or the BWI newsletter.

Objection to certain processing activities

You have the right to object to processing that is based on our legitimate interest, if you have personal reasons. We may however, continue to process your Personal Data if, even if you object thereto, we have compelling legitimate grounds for the processing that override your interests.

Right to erasure

You have the right to request that your Personal Data is erased. The right is not absolute and only applies in certain circumstances.

Restriction of processing

You have the right to request that the processing of your Personal Data is restricted. Please note that this may prevent us from providing you with all our services.

Data portability

You have the right to receive a digital copy of your Personal Data that we process, in a commonly used, structured and machine readable format (data portability), to move to, and use with another supplier. The right to data portability, distinct from Right of Access to Personal Data, only applies to the Personal Data that you have provided us that we process based on your consent or our fulfilment of an agreement with you.

Lodge a complaint with a supervisory authority

If you are not happy with the way we process your Personal Data, or if you for another reason believe that we have processed your Personal Data in an unlawful manner, you have the right to lodge a complaint with the supervisory authority responsible for data protection.

Recruitment

If you submit a job application, we process your Personal Data in order to evaluate your application and recruitment. This includes, if applicable, references and background checks, if part of the recruitment process.

We kindly ask you not to send us any sensitive Personal Data (e.g. information revealing health conditions, race or ethnicity).

If you are offered and accept employment with us, some of the Personal Data we have collected during the recruitment process will form part of your employment contract.

Your Personal Data and other information in your job application will not be transferred to other BWI hotels.

Personal Data

- Identity related data such as your name
- Contact details such as email address, telephone number, postal address
- Educational background, recruitment details, CV, personal letter
- Information regarding what role, area, country and type of employment you have applied for
- Sex, citizenship and nationality
- Grades, certificates, work experience, education or other information you voluntarily provide us with as part of your application

Legal basis for processing

- Processing your application is based on your consent, if we don't have the applicant consent we will not process the application

Your application is saved throughout the entire recruitment process. If you are not offered a job with us, we may save the information we have collected up to 12 months after the recruitment process has finished.

Legal obligations

We may also process your Personal Data if we are compelled by Danish Law to fulfil our obligations with regard to financial reporting, under tax law or due to a decision by the police, courts or other authority.

Personal Data

- Identity related data such as your name
- Payment data
- Booking data
- Contact details such as email address, telephone number, postal address
- Receipt details, e.g. previous purchases

Legal basis for processing

- Processing is based on legal obligations

If you have any questions, please do not hesitate to contact us:

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Denmark

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email: Hotelcity@hotelcity.dk