Privacy Policy

Welcome to the Privacy Policy of Mardan Management Limited, trading as Cullen Bay Hotel.

We are committed to preserving the privacy, integrity and security of the personal information we hold about our customers and those who make contact with us. We have developed this Privacy Policy to explain how we manage and use this personal information and to ensure we comply with our legal obligations under applicable data protection laws.

It is important that you read this privacy policy carefully so that you are fully aware of how we collect and process personal information.

The Controller of your Personal Information

Under applicable data protection laws, we are required to advise you who is the controller of your personal information. The controller of, and the person responsible for, the personal information covered by this policy is Mardan Management Limited, Cullen Bay Hotel, Cullen, Buckie AB56 4XA

Other contact details for the controller are set out below under "HOW TO CONTACT US".

Terminology Used in this Policy

A "Customer" is someone who makes a booking, or stays, or uses any of the services at our hotel, or other facilities.

A "Contact" is someone who makes an enquiry, or contacts us, on our website or in person or by letter, phone, email or text, enters into a competition run by us or use Wi-Fi services offered at our property but is not a customer of ours.

"we" "us" and "our" refer to Mardan Management Limited trading as Cullen Bay Hotel.

"you" and "your" refer to our customers and contacts.

What Information do we collect about you

Customers

The personal information we collect may include:-

- name, email address, home and/or business address, phone number;
- bank accounts and payment card information;
- booking history;
- transactional data including details about payments to and from you and other details of products and services you have purchased from us;
- information relating to your use of our services, such as room preferences, special requests, feedback and survey responses.

We will collect this data from you when you provide it to us by phone, email, post, through our website, third party websites and booking agents or directly in person.

we will only use your personal information as the law permits, we do not share this information with any other parties. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:-

- (i) it is necessary for the performance of a contract between us for the provision of services or in order to take steps at your request prior to entering into such a contract; and/or
- (ii) it is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We intend to use your personal information for the following purposes:-

- to fulfil your bookings and/or to provide services or facilities you request from us;
- to collect payment from you;
- to administer and manage our relationship with you, which may include asking you to complete surveys or feedback forms;
- where you have made a reservation with us, to send you information before your visit to confirm the reservation which we think you may find of interest;
- to send you marketing and promotional material where we think this may be of interest to you (unless you have objected to receiving this by contacting us using the contact details set out under "HOW TO CONTACT")
- where required by law;and
- where necessary to protect your health or wellbeing or that of another individual.

Contacts

The personal information we collect may include

- (i) name, email address, home and/or business address, phone number;
- (ii) Marketing and/or contact preferences if provided

We will collect this data from you when you provide it to us by phone, email, post, through or website, third party websites, booking agents or directly in person.

We will only your personal information as the law permits, we do not share this information with any other parties. By laws we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these

- (i) it is necessary for the purposes of our legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests; and/or
- (ii) it is necessary for us to comply with a legal obligation on us; and/or
- (iii) it is necessary to protect your vital interests or those of another individual.

Your right to access your personal information and your other rights

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

- to 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;
- to 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;
- to 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. 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;
- to 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 that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

If you wish to exercise any of the right set out above, please contact us by using the contact details set out below under "HOW TO CONTACT US"

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidently 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.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you read the privacy notice of every website you visit.

Changes to this Policy

We may need to make changes to this Privacy Policy from time to time to take account of changes in law or the needs of our business. Please refer back to this page regularly to see any changes or updates to this policy. This policy was last updated on 24th May 2018.

How to contact us

If you have any questions about this privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:-

By post:

FAO: Data Controller

Mardan Management Limited

Cullen Bay Hotel

Cullen Buckie AB56 4XA

By email: stsay@cullenbayhotel.com