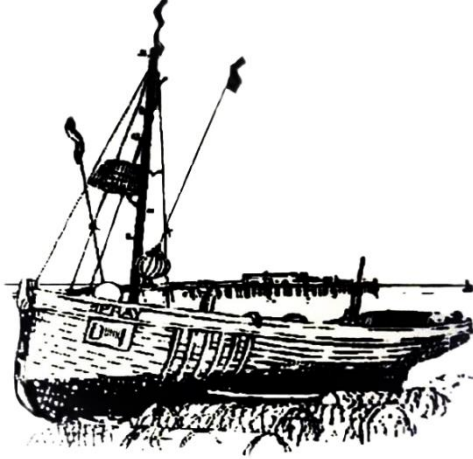


DUNKERLEY'S

SEAFOOD RESTAURANT & HOTEL



Privacy Statement

Revised March 2024

DATA COVERED BY THIS PRIVACY STATEMENT

This Privacy Statement describes the privacy practices of Dunkerley's Hotel and Restaurant for Data that we collect:

- *through our website www.dunkerleys.co.uk which is operated by us from which you are accessing this Privacy Statement*
- *through the software applications made available by us for use on or through computers*
- *through our social media pages that we control*
- *through email messages that we send you and through your communications with us online or in person.*
- *from third parties such as public databases, marketing partners, and other third parties; and*
- *when you visit or stay as a guest at Dunkerley's Hotel and Restaurant*

THE DATA WE COLLECT

At touchpoints throughout your guest journey, we collect Personal Data in accordance with the law, and to provide you with exemplary services. Personal Data is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- *Name*
- *Gender*
- *Postal address*
- *Telephone number*
- *Email address*
- *Financial information (such as credit and debit card number or other payment data)*
- *Date of birth*
- *Nationality, passport, visa, or other government-issued identification data*
- *Important dates: birthdays, anniversaries, and special occasions*
- *Employer details (for business-related bookings)*
- *Prior guest stays or interactions, and services purchased, special service and amenity requests.*
- *Social media account ID, profile photo and other data publicly available, or data made available by linking your social media.*

In more limited circumstances, we may also collect:

- *Data about family members and companions*
- *Biometric data; and*
- *Images, video and audio data via security cameras located in public areas, such as hallways and lobbies, in our property.*

We may also collect information about your "Stay Preferences" that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your "Personal Preferences," that may include details of your special anniversaries (such as your birthday or wedding anniversary).

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

THE ONLINE AND MOBILE DATA WE COLLECT

Typically, we do not collect Personal Data through your use of the Online Services. However, we may collect "Other Data" that does not directly identify you. To the

extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data.

“Other Data” includes:

System Data: When you use both desktop and mobile devices to access the Online Services, we collect certain data through your browser or automatically through your device, such as your computer type, screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services you are using.

IP Address: We also collect your IP address, a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.

- *or until you use your phone’s or other device’s settings to disable location capabilities for the Bonvoy™ App or other program.*

HOW AND WHERE WE COLLECT YOUR DATA

This Privacy Statement describes the privacy practices of Dunkerley’s Hotel and Restaurant for Personal and Other Data that we collect through the following:

- *Dunkerley’s Hotel and Restaurant -We collect personal data for the purposes described in this Privacy Statement, such as providing and personalizing the services, communicating with you and to accomplish our business purposes.*
- *Other Sources & Service Providers. We collect personal data and other data from online travel agencies.*
- *Online Services. We collect personal or other data when you interact with our online services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our website, communicating with us, or otherwise connecting with us or posting to social media pages.*
- *Customer Care We collect personal data when you make a reservation over the phone, communicate with us by email and contact customer service. These communications may be recorded for purposes of quality assurance and training.*
- *Internet-Connected Devices. We collect personal and other data from internet-connected devices available in our properties. For example, when you connect a device to the hotel’s internet.*

WHY WE COLLECT YOUR DATA (LEGAL BASES)

Please note that in some jurisdictions you must agree to the collection of your Personal Data in order for Dunkerley’s Hotel and Restaurant to provide its services.

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Booking & Guest Registration	<p>There are a number of activities associated with this purpose, such as: facilitating reservations and bookings of hotel accommodations and related services; engaging in prearrival communications (logistics, changes, preferences, etc.); and processing payments and security deposits.</p>	<p><i>Performance of contract for the individual with the guest booking the room</i></p> <p><i>Legitimate interests for the individual booking the room, for example, honouring his/her/their preferences, as well as for any individuals accompanying the primary guest (e.g., spouse, children, friends)</i></p> <p><i>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</i></p>
On-Site Reception & Stay Services	<p>There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services (based on past usage or expressed preferences); luggage storage; making arrangements with third-party providers on behalf of guests (such as arranging taxi services; and facilitating reservations and bookings at restaurants and events); facilitating access to Wi-Fi, TV and other connectivity</p>	<p><i>Performance of contract, such as processing payments</i></p> <p><i>Legitimate interests, such as honouring the guest's preferences (e.g., for a Principal room or on a specific floor)</i></p> <p><i>Consent, such as collecting information regarding dietary preferences that the guest chooses to provide</i></p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	<p><i>services; facilitating in-room dining (including taking into account any dietary, health restrictions or other personal needs expressed by the guest); housekeeping services (including preferences by the guest) handling customer requests, enquiries and complaints and determining eligibility for age restricted goods and services (such as alcohol).</i></p>	
Conferences & Events	<p><i>There are a number of activities associated with this purpose, such as: communicating with customers, facilitating reservation and bookings of events; engaging in pre event communications (logistics, accommodations, changes, etc.); preparing for and coordinating events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; handling customer requests, enquiries and complaints; and communicating with participants during Events.</i></p>	<p><i>Performance of contract, such as collecting information regarding a planned Event</i></p> <p><i>Legitimate interests, such as responding to customer complaints or concerns relating to an Event</i></p> <p><i>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</i></p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Dunkerley's Hotel and Restaurant Operations & General Business	<p><i>There are a number of activities associated with this purpose, such as: administering customer-care services to facilitate and address inquiries, comments and complaints about any of our services (such as in person, through phone lines, email, or on social media); handling security and fraud prevention; monitoring and analysing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, carrying out pilot programs for potential new services and both developing new and improving existing services.</i></p>	<p><i>Legitimate interests, such as responding to customer complaints and concerns</i></p> <p><i>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</i></p>
Emergency & Incident Response	<p><i>There are a number of activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies (including facilitating first aid services); actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting</i></p>	<p><i>Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel</i></p> <p><i>Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel</i></p> <p><i>Legal obligations, such as documenting onsite accidents</i></p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	<p><i>assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).</i></p>	<p><i>Individuals' vital interests, such as contacting medical or emergency services for an ill guest</i></p>
Legal & Compliance	<p><i>There are a number of activities associated with this purpose, such as: complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting national security or law enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of Dunkerley's Hotel and Restaurant, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that Dunkerley's Hotel and Restaurant may sustain.</i></p>	<p><i>Legal obligations, such as complying with legal processes</i></p> <p><i>Legitimate interests, such as enforcing terms and conditions to protect trademarks</i></p> <p><i>Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents involving guests</i></p>
Food & Beverage Services	<p><i>There are a number of activities associated with this purpose, such as: facilitating reservations; honouring dietary preferences; providing consistent and personalized service based</i></p>	<p><i>Performance of contract, such as processing payments</i></p> <p><i>Consent, such as collecting information about dietary, health restrictions, or</i></p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Accounts, & Relationship Management	<p>on past usage and preferences expressed by the individual; processing payments; arranging reservations; and handling customer requests, inquiries, and complaints.</p>	<p>personal needs of a guest when ordering food</p> <p>Legitimate interests, such as providing personalized services (e.g., offering red wine to a guest based on previous requests)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests (e.g., when an individual becomes ill in one of the restaurants)</p>
Marketing, & Third-Party Service	<p>There are a number of activities associated with this purpose, such as: providing consistent and personalized service based on past usage and the preferences expressed by guests; processing payments; notifying guests about changes to bookings, terms and conditions; and handling guest's requests, enquiries and complaints.</p>	<p>Performance of contract, such as assessing points and distributing benefits</p> <p>Legal obligations relating to financial transactions such as the obligation to maintain books and records</p>
Marketing, & Third-Party Service	<p>There are a number of activities associated with this purpose, such as: communicating about products and services that may be of interest to</p>	<p>Legitimate interests, such as providing advertisements for similar products and services</p>

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
	<i>guests; other promotions and handling customer requests, enquiries, and complaints.</i>	<i>Legal obligations for handling information</i>

MORE INFORMATION ABOUT YOUR PERSONAL PREFERENCES

Our goal is to serve you better and meet your expectations and preferred level of hospitality at each stage, from the moment that you book with us through to when you check out. See below to learn more.

PERSONAL PREFERENCES	PURPOSES	LEGAL BASES
Anniversaries	<i>When you stay with us, we want to help you celebrate any special occasion, such as an anniversary, birthday. For example, we may make a note of these dates to allow us to provide you with a birthday or anniversary dessert.</i>	<i>Consent, where applicable</i>
Relationships (husband, wife, son, daughter, family friend etc.)	<i>We understand that your Preferences may change depending on who you are traveling with (such as your preferred room type). We may keep a record of your relationships to assist us with making your Dunkerley's stay as comfortable as possible. For example, if we know you are traveling with small children, we can proactively plan for additional accommodations such as a crib or roll-away bed.</i>	<i>Legitimate interest, in order to provide you with exceptional service. Consent, where applicable</i>

PERSONAL PREFERENCES	PURPOSES	LEGAL BASES
Preferences for facilities	<i>When you are staying with us, we want to make sure that we can provide you with services to enhance your Dunkerley's experience. To do this, we may retain your preferences for our facilities, based on your past stay preferences or your restaurant visits.</i>	<i>Legitimate interest, in order to provide you with exceptional service. Consent, where applicable</i>
Dietary preferences	<i>When you stay with us, we want to ensure that you are safe, that we are looking after your wellbeing, and to provide you with services to enhance your Dunkerley's experience. For example, we may make a note of your dining or beverage preferences so that we are prepared if you request room service or dine at one of our cafes or restaurants.</i>	<i>Legitimate interest, in order to provide you with exceptional service. Consent, where applicable</i>

HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share Personal Data and Other Data with the following:

- Dunkerley's Hotel and Restaurant We disclose personal data and other data to other companies within Dunkerley's Hotel and Restaurant for the purposes described in this Privacy Statement, such as providing and personalizing the services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes. We share your Personal Data and Other Data used for making reservations with the applicable property and Marriott entity to fulfil and complete your reservation.*
- Owners: We disclose personal data and other data to the Owners of Dunkerley's Hotel and Restaurant for the purposes described in this Privacy Statement. Owners have a limited right to use certain personal data for their*

own purposes and therefore qualify as independent data controllers for the following processing: Owners may use your personal data for complying with their own legal obligations, including maintaining books & records and other compliance obligations.

- *Service Providers.* We disclose personal data and other data to third-party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services.

Other Uses and Disclosures:

We will use and disclose personal data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations, such as in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Dunkerley's Hotel and Restaurant, assets or stock (including any bankruptcy or similar proceedings); (f) to protect the rights, privacy, safety or property of Dunkerley's Hotel and Restaurant, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose other data for any purpose, except where we are not allowed to under applicable law.

YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS

At Dunkerley's, we believe that you should have choices with respect to your data. We provide you with the options, information, and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

Communication Preferences

- To change how we or our partners communicate with you, please contact Dunkerley's Hotel and Restaurant Reception team.
- NOTE: We will continue to send you transactional messages, such as information about your reservations or stays, including confirmation and pre-arrival emails, or account security updates.
- If you want to adjust your stay preferences, please contact Dunkerley's Hotel and Restaurant Reception team.

Individual Rights

How You Can Request Access, Correction, Deletion, or Confirmation of the Use or Objection to the Processing of Your Personal Data

You can make a Subject Access Request (SAR) to find out what information Dunkerley's Hotel and Restaurant holds about you. We will respond to your request within one calendar month.

To make a SAR, please email our Data Protection Officer, Katie for our SAR form at info@dunkerleys.co.uk

You can ask someone else to make a SAR on your behalf. We will need to see evidence that the person making the request is entitled to act on your behalf and they will also need to provide us with evidence of your identity.

Please note we will not retain copies of your identification documents or card details, these are destroyed upon your departure. For your protection, we only fulfil requests for the personal data associated with the email address that you identify in your request, and we may need to verify your identity before fulfilling certain requests. When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request.

Dunkerley's Hotel and Restaurant acknowledges and respects our guests' privacy, and we will try to comply with your request as soon as reasonably practicable and consistent with applicable law. Please note that all individual rights may not be available under applicable law to all our guests or other users of our services.

OTHER IMPORTANT PROVISIONS

Non-Dunkerley's Group Entities

We are not responsible for the data collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any personal data you disclose to other organisations through or the Apps or our social media pages.

Security

We seek to use reasonable organisational, technical, and administrative measures to protect personal data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your data has been compromised), please immediately notify us in accordance with the "[Contact Us](#)" section, below.

Retention

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- *The length of time we have an ongoing relationship with you and provide the services to you (for example, for as long as you keep using the Services and for as long as it is necessary)*
- *Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and*
- *Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations).*

Use of Services by Minors

The services are not intended for children, and we do not knowingly solicit or collect personal data from children under the age of eighteen (18) without parental consent. We request that they do not provide personal data.

Updates to This Privacy Statement

The “Last Updated” date at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on our website. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at info@dunkerleys.co.uk.

CONTACT US

If you have any questions about this Privacy Statement, please contact us at info@dunkerleys.co.uk.

If you live in the United Kingdom, the data controller is Dunkerley’s Hotel and Restaurant, with an address of

*Dunkerley’s Hotel and Restaurant
19-21 Beach Street
Deal
Kent, CT14 7AH*

Additional Information

DATA CONTROLLER

Dunkerley’s Hotel and Restaurant acts as an independent data controller in relation to our owners, who have a limited right to use the data we collect as described below:

Owners: We disclose data to owners of Dunkerley’s Hotel and Restaurant for the purposes described in this Privacy Statement. Owners have a limited right to use certain personal data for their own purposes and therefore qualify as independent data controllers in order to comply with their own legal obligations, including maintaining books & records and other compliance obligations.

You can also:

- Contact our data protection officer Katie Louise Dunkerley via **info@dunkerleys.co.uk** stating **“For the attention of the DPO”** In your email, please indicate the date that you stayed/visited Dunkerley’s Hotel and Restaurant.
- Lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection laws occurs. For the EEA, a list of the national data protection authorities can be found **[here](#)**. For the UK, the responsible data protection authority is the Information Commissioner’s Office (ICO), more details about which can be found on the **[ICO website](#)**.