

## PRIVACY STATEMENT

The privacy and security of your information is very important to us at The Parkavon Hotel Killarney. We want you to trust that the information that you have provided to us is being properly managed and protected. The Hotel fully respects your right to privacy and will not collect any personal information about you without your clear consent. Any personal information, which you voluntarily disclose to The Parkavon Hotel Killarney, will be treated with the highest standards of security and confidentiality, strictly in accordance with our Privacy Policy 2019, the UK Data Protection Act 1998, the Irish Data Protection Acts of 1988 and 2003 and the EU General Data Protection Regulation Act 2018.

We have prepared this Privacy & Cookies Policy to explain more about how we collect and manage your information in the course of our business.

### Information we collect and how we use and share it

We collect and use personal information if you make a booking through our reservation system, stay at our hotel or interact with us. We generally collect this information directly from you, but in some cases, we may collect your information from other sources. For example, we occasionally run promotions where we ask you to refer a friend to us. In these cases, we always ask you to make sure anyone they refer is happy for their personal information to be passed to us, and to direct friends to read this privacy policy if they want to find out more about how we use their information. We also collect information through our third party service providers' use of technologies such as pixels, web beacons, tracking tools and similar technologies.

### If you make a reservation or stay at our hotel

**Information we collect:** We collect information from you when you make a booking through our reservation system or stay at our hotel. Information collected during the course of the reservation and during your stay may include:

Your name, email address, home and business address, phone number, nationality and payment card information and information such as stay and room preferences made during the course of your reservation such as your preferred room type and specific requests to the hotel.

This information may be provided to us directly when you make a reservation through our website, directly at the hotel or through our mobile applications. In some cases, we will receive this information from a third-party, such as when you book through an online travel agency or if information is provided directly to one of our agents.

**How we use this information:** We use the information collected from you primarily to fulfil your hotel reservation. Prior to your stay this may include sending your information to the hotel or sending you pre-stay communications. Following your stay, we may also send you post-stay communications and satisfaction surveys to get feedback on your experience.

In some instances where we have your consent or where permitted under applicable law, we may send you marketing communications (which may include text messages or ezines) for products and services that we believe would be relevant for you. We also may use information related to your stay to display targeted advertisements on our website or on third-party websites or to send you more relevant messaging.

**Who we share your information with:** We will use your information to fulfil your reservation. We may also share your information with third-party service providers to provide services in relation to our business as well as to help us improve our products and services.



# the Parkavon

HOTEL

We also share your stay information with other third parties in circumstances such as:

when we believe in good faith that the disclosure is required by law or to protect the safety of hotel guests, employees, the public, when disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process; or in the event of a merger, asset sale, or other related transaction.

## Data transfer

It may be necessary to transfer your information to a country outside of the country where it was originally collected or outside of your country of residence or nationality.

Where we transfer information which originates in the European Union ("EU") to a country outside of the EU, we will take steps to make sure such transfer is carefully managed to protect your privacy rights:

- where we transfer your data to other companies providing us with a service, we will obtain contractual commitments and assurances from them to protect your information. Some of these assurances are well recognised certification schemes such as standard contractual clauses and the EU - U.S. Privacy Shield for the protection of personal information transferred from within the EU to the United States of America;
- we will only transfer personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for information we receive from law enforcement or regulators will be carefully validated before personal information is disclosed.

## Using our website, mobile application and other technology

We and our third-party service providers use cookies, pixels, web beacons, tracking tools and other similar technologies on our website, mobile application and in other areas of our business to collect information and provide you with the services that you have requested or participate in and to provide targeted advertising.

## Cookies and other tracking technologies

**What is a cookie:** A "cookie" is a small text file that is placed onto an Internet user's web browser or device and is used to remember as well as obtain information about that party. You might be assigned a cookie when visiting our websites or when using our mobile applications. In some instances, where permitted under the applicable law, cookies may also be used for the purposes of certain email campaigns.

**What types of cookies we use and how we use them:** We use three primary types of cookies, which include:

- **Functional Cookies** – these cookies support the use of the website and applications and enable certain features to enhance your experience. For example, we use functional cookies to facilitate your reservation and to remember your selections as you move from page to page. We also use functional cookies for remembering things like your sign-in information and hotel preferences to avoid you having to re-enter it.



# the Parkavon

## HOTEL

- **Performance Cookies** – these cookies collect information needed to support the website and our applications and allow us to improve our website and identify any problems that you faced while visiting us. For example, performance cookies may provide us with information about how you came to our website and how you navigated around our website during your visit. We also use these cookies to provide us with certain statistical and analytics information, such as how many visitors came to our website or how effective our advertising is.
- **Targeting Cookies** – these cookies are used to collect information from you to help us to improve our products and services as well as serve you with targeted advertisements that we believe will be relevant for you. We use targeting cookies across our websites and applications for various marketing initiatives and campaigns. For more information, please see the “Targeted advertising” section below.
- **Third-party cookies:** As described above, we use a number of third-party service providers to help us manage, carry out and improve our advertising. These parties may set cookies at our direction to help us collect information and provide you with advertisements that we believe would be relevant for you.

**Managing cookies and opting out:** You can choose to visit our web sites without cookies, but in some cases certain services, features and functionality may not be available. To visit without cookies, you can configure your browser to reject all cookies or notify you when a cookie is set. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

**Other technologies:** Other technologies such as pixels and web beacons may also be used on our websites, mobile applications, in email messages and in other areas of our business. These technologies are used to improve our products and services as well as our marketing efforts.

**Targeted advertising:** We and our third-party service providers may serve targeted advertisements through the use of first-party or third-party cookies, pixels and web beacons when you visit our website, use our mobile applications, or visit third party websites.

### Location information and services

We may receive information about your location during the course of and for the purpose of providing you the services described above through your use of our websites and mobile applications. For example, if you are using our mobile applications and have consented to sharing your location information with us, this information might be collected through GPS or Bluetooth technologies to enable us to provide certain services to you such as customised offers and promotions. In addition to your use of our websites and mobile applications, we may also receive location information from wireless networks or cellular towers in proximity to your mobile device, through your Internet protocol (“IP”) address or through your use of other services we provide at our hotels. We may also have access to location information that you provide to us through your use of social media, such as when you “tweet” your location. Your location preferences can be set or modified at the device level or through modifying your settings with the relevant social media platform.

### Mobile applications



# the Parkavon

We receive information about you when you use our mobile applications. Some information such as your device manufacturer, type and operating system version are collected automatically, while other information is only collected if you choose to provide it, such as your location information. Where we process and use your personal information in connection with any mobile applications, we will do this in line with the general principles outlined in this Statement unless we tell you otherwise.

## Online Channels

We may use information from online sources, such as websites, social media and information sharing platforms. This information may be used to help tailor and improve our services and communicate with you effectively, as we know many of our customers use a range of media channels to communicate and share information such as the Facebook "Like" button on our websites and mobile applications. We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms

## Using Personal Information to create profiles

As described in the section above in relation to cookies, we have relationships with third parties such as Google and Facebook which enable us to serve targeted advertising. In addition to the activities described under the heading Targeted Advertising above, we also match Facebook and Google users across sites and devices which enables us to better understand your interests. We use this information to enable us to tailor our marketing communications to you so we can make sure we tell you about things which are most likely to be of interest to you. You can opt-out of receiving these offers.

## How we secure your information

We are committed to protecting the confidentiality and security of the information that you provide to us. To do this, technical, physical and organisational security measures are put in place to protect against any unauthorised access, disclosure, damage or loss of your information. The collection, transmission and storage of information can never be guaranteed to be completely secure, however, we take steps to ensure that appropriate security safeguards are in place to protect your information.

## Managing your preferences and information

We want to ensure that you have the necessary tools at your disposal to control the information that you provide to us, including how we communicate with you. It is also important that you contact us to update your information if any of it is inaccurate or changes. Please see the relevant section below to learn more about how to control how we communicate with you and how to update, modify and delete your information.

## Managing your communication preferences

Through the provision of the services described above, we, third-party partners and service providers, may communicate with you in relation to a reservation, through online digital services (e.g. online advertising, social media communications), or to support any other services that we provide.



## **Managing your information**

In the event any information that you provide to us is inaccurate, changes or you would like this information deleted, your information can be updated by contacting us, details found in the "How to contact us section". We will respond to your request within a reasonable timeframe. Please note that in some instances it may not be possible to delete certain pieces of your information and a portion of the information may be needed for suppression purposes. In other instances, we may not have the ability to delete certain pieces of information that are stored on our systems or that have been provided to third parties in connection with the services discussed in this Privacy Statement.

## **Children**

Our website is not intended for children and we do not intentionally solicit or collect personal information from individuals under the age of 18. If we are notified or otherwise discover that a minor's personal information has been improperly collected, we will take all commercially reasonable steps to delete that information.

## **Retaining your information in our systems**

We generally only keep your information for as long as is reasonably required for the reasons explained in this privacy policy. In some cases, we keep transactional records (which may include your information) for longer periods if necessary to meet legal, regulatory, tax or accounting needs. We will also retain information if we reasonably believe there is a prospect of litigation. We maintain a data retention policy which we apply to the records we hold.

## **How to contact us**

For any questions or concerns regarding this Privacy Statement or our data privacy practices, please contact us: The Parkavon Hotel, Muckcross Road, Killarney, Co. Kerry, Ireland

- By email: [info@parkavonhotelkillarney.com](mailto:info@parkavonhotelkillarney.com)
- By post:  
The Parkavon Hotel,  
Muckcross Road,  
Killarney, Co. Kerry, Ireland  
V93 YX95
- By phone: 00353 6466 33000
- By fax: 00353 6466 33001
- Email: [info@parkavonhotel.com](mailto:info@parkavonhotel.com)

## **Subject access request**

To the extent permitted under the local law, you may also use the above contact details to request access to any of your personal information that is held by us. These requests will be reviewed and processed in line with the local law.



# the Parkavon

## HOTEL

Where EU data protection laws apply, you have a right to lodge a complaint with your local data protection officer at any time. However, we ask that you please try to resolve any issues with us first before referring your complaint to the supervisory authority.

### Changes to this Privacy Statement

In some instances, we may have to change, modify or amend this Privacy Statement in order to comply with the evolving regulatory environment or the needs of our business. Subject to any applicable legal requirements to provide additional notice, any changes to this Privacy Statement will be communicated through our websites and mobile applications.

### Your rights under EU data protection laws

You have legal rights under EU data protection laws in relation to your personal information.

#### To access personal information

- You can ask us to confirm whether or not we have and are using your personal information and for a copy of your information.

#### To correct / erase personal information

- You can ask us to correct any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.
- You can ask us to erase your information if you think we no longer need to use it for the purpose we collected it from you. You can also ask us to erase your information if you have either withdrawn your consent to us using your information

#### To object to how we use your information

- You can object to any use of your information which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information.

#### To ask us to transfer your information to another organisation

- You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your information in order to perform a contract with you, or where we asked for your consent to use your information. This right does not apply to any information which we hold or process that is not held in digital form.

### Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

- You can ask to obtain a copy/reference to, the safeguards under which your personal information is transferred outside of the EU. We may redact data transfer agreements to protect commercial terms.
- We may ask you for proof of identity when making a request to exercise any of these rights. We do this to make sure that we only disclose information where we know we are dealing with the right individual.
- We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.
- We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will let you know if we think a



# the Parkavon

## HOTEL

response will take longer than one month. To help us respond more quickly, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

**Effective Date:** 23 October 2019

