

Introduction and General Policy

Castleknock Hotel provides Accommodation, Bar and Restaurant and Gym, Spa and Leisure facilities to its customers and guests.

We (Castleknock Hotel) take the utmost care to ensure that the personal information we obtain from you to enable us to provide these services is not used in a way that you are unaware of or not agreeable to you.

Please read this policy carefully (together with our cookies policy) as it is intended to clearly set out to you how your personal data that is collected by us is processed by us. By submitting the information, you confirm that we are authorised to process it on your behalf in accordance with this Privacy Policy.

Please note that from time to time, supplementary privacy notices may be provided to you where we wish to provide you with additional information in relation to our data processing activities. These privacy notices should be read in conjunction with this policy and are not intended to supersede this main privacy policy.

Our identity as Data Controller

Castleknock Resort Limited (trading as Castleknock Hotel) is part of the FBD Hotel and Resorts Group (<u>www.fbdhotels.com</u>). Castleknock Resort Limited is a Data Controller.

If you have any questions or comments about this policy, please address these to the Data Protection Administrator by any of the following mediums;

Phone	+353 (1) 640 6300
Email	DPA@castleknockhotel.ie
Business Address	Porterstown Rd, Castleknock, Dublin 15, D15 WNR7, Ireland

What personal information is Collected?

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any special categories of personal information about you.

Generally speaking, at the time you submit personal information or make a request, the intended use of the information that you submit will be apparent in the context in which you submit it and/or because the website or form states the intended purpose.



We have prepared the following table to indicate the main categories of personal data we process.

1) Data Sourced from the website or via any other direct interaction with you.
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Category of Personal	Data Subject (Generally)	Types of Personal Data
Data		Collected
General Identity	Anyone person that interacts	Examples would be;
Information	with the hotel and its	
	associated services may	Name, Address, Mobile Phone
	provide us with some	Number, Gender, Email
	element of personal data	Address, employer name
	The person who we have	
Financial Information	contracted with to provide	Credit/Debit Card or Bank
	the goods or service	Account Details
Relationship Data	The person who we have	May involve survey responses,
	contracted with to provide	customer testimonials or
	the goods or service	complaints
C.V. and Associated	Potential Employees	General Identity Information
Personal Data		and personal data you include
		on a CV or cover letter.
CCTV	Public at Large	CCTV Data
Marketing and Loyalty	Our Customers and Potential	Opt-Out Preferences for
Preferences	Customers	Marketing Communications.
Health Questionnaires	All persons coming to use the	Your recent medical history in
(Covid 19)	facilities – particularly users	specific relation to COVID19
	of the health club and spa.	
		Examples would be;
		Specific Room Preferences or
Your Preference	May be any person that	requests, Allergy Information,
Information /	interacts with our hotel and	Function/Event Set-Up
Information you have	associated services	preferences, Car Registration
provided to us		Number
		Generally, includes data that
		you have asked us to process
		on your behalf or where we
		have asked you to provide to us
		to improve our service levels
		and your customer experience.



2) Data Sourced from the Website (Only)

Category of Personal Data	Data Subject (Generally)	Types of Personal Data Collected
Technical Data (to compile statistical data via cookies)	Anyone that uses our website or uses our on-site wi-fi facilities	IP Address, Browser Type, Access Time and referring URL
		Please refer to Cookies Policy

Website usage information is collected using Cookies. This information may be used to help us improve our site and the services we offer. Cookies are small text files that a site transfers to a visitor's hard disk or browser for added functionality or for tracking site usage. In order to measure the effectiveness of our online presence, Castleknock Hotel may use cookies to determine the path users take on our site and to identify repeat visitors of our site. We do not use cookies to gather personal information such as a person's name or e-mail address.

We only ask that you disclose enough personal data as is necessary to;

- process a booking with us for general hospitality, leisure or associated services,
- respond to you as comprehensively as possible where you have asked us a question, made a comment or a suggestion or requested additional information about us,
- manage our ongoing relationship with you, our customer,
- contact you in relation to future marketing initiatives and hotel promotions,
- improve the quality of your visit to our website or our hotel,
- enable us to function as a business, but while always ensuring that any privacy impact to you, the data subject, is minimised and that there is a fair balance between our rights as a data controller and your rights as a data subject.

Why do we collect your personal information?

We may process your personal data for many different reasons.

1) To comply with our legal and statutory obligations

- 2) To enter into and perform a contract for a product or a service with you
- 3) To enable us, acting in our legitimate interests, to function as a business

4) To enable us to carry out activities considered to be in the public interest, or in the vital interest of a data subject

5) To enable us to carry out any processing activity of your personal data, where that processing activity requires us to obtain your consent.

We have prepared the following table to explain this in more detail to you.



Legal Basis of Processing	Explanation/Examples
1) To Comply with legal and statutory obligations	As Hoteliers, we operate within a wide ranging legislative framework that requires us provide a duty of care to our guests. We process personal data to ensure that we meet these obligations.
2) To enter into and perform a contract for a product or a service	Generally, our customers use our website to enquire about and to make bookings for hotel accommodation and associated services. These bookings bind us contractually and there is a necessity for
	us to process certain personal data in order to fulfil our obligations under the contract.
	For example, you will receive a confirmation email from us in relation to your accommodation booking.
3) To enable us, acting in our legitimate interests, to function as a business	 Examples of us processing your data under this basis include; Where you are a customer, contacting you by email in relation to your stay (before and after) for the purposes of ensuring that we meet your expectations in making your stay as enjoyable as possible and obtaining your feedback, so we can improve our overall offering to guests.
	 Where you have signed up as a member of any of our loyalty schemes or our leisure centre, we will contact you from time to time in relation to benefits and advantages to you as a member of the scheme(s) or club and in relation to the renewal of your leisure centre membership.
	 Except where we are relying on your consent for the purposes of processing personal data for marketing purposes, we process personal data for marketing purposes as is necessary for the purpose of our legitimate interests in promoting our products and services, subject to any opt-out preferences you notify us of in respect of electronic direct marketing communications.



Legal Basis of	Explanation/Examples
Processing	
	 Please be aware that you may object at any time to us processing your personal data under our legitimate interests as a data controller by a) contacting us directly at the details provided above or b) simply choosing the 'opt out' option on any communication from us.
	In line with current COVID19 government advice, basic contact information may be requested from customers that wish to avail of any of our services for the sole purposes of potential contact tracing if required.
4) Where we request information from you, for the purposes of the maintaining the public interest	Similarly, you may be asked to provide us with a completed COVID19 questionnaire before you use certain facilities at our Hotel, in order for us to carry out a risk assessment as to whether we can allow you to avail of these facilities.
	This data is processed by us in an effort to cease the spread of infectious diseases such as COVID19 throughout the public domain
	It will be clear to you when you are providing consent to us to process your personal data as you will be the person providing us with that express consent. Examples would include;
5) Where you have provided your consent for us to process your data.	-Where you have expressly indicated to us your wish to receive our marketing communications.
	-Where you make an incomplete booking on our website, we will ask for your consent to us to allow us to contact you with a reminder about completing the booking at a later date.
	Please be aware that where processing of your data is based on consent you have the absolute right to withdraw your consent at any time.



What will happen if I do not provide personal data?

If we require your personal data, for example, where we intend to enter into a contract with you, and you fail to provide us with this data, we may not be able to perform our obligations under our contract with you. e.g. book you a room.

Children's Privacy & Parental Consent

Please be aware that Castleknock Hotel has not designed this site for and does not intend for it to be used by, anyone under age 18.

What do we do with your personal information?

All personal data we hold about you will be processed by our staff in Ireland, unless otherwise indicated.

We do not sell, rent or share your personal information to any third party joint promoters, nor use it for any unapproved commercial purposes.

On occasion, where it is necessary, we may need to share basic personal data with third parties in;

- order to satisfy applicable laws and regulations, as part of a legal process or where a valid request has been made by a public body e.g. An Garda Siochana or the Revenue Commissioners.
- To protect the public interest, where your basic contact information may be shared with the Health Service Executive (HSE), or a body nominated by the HSE, for the purposes of contact tracing to prevent the spread of infectious diseases.
- order to allow us to perform our obligations under a contract. e.g. make bookings for you at nearby golf courses or swimming pools etc.
- connection with a merger, acquisition, sale corporate reorganisation or other changes in corporate control.
- order to ensure that events, functions or large group bookings are hosted efficiently, your personal data may be shared with the event, function or group booking organiser.
- relation to the general management and administration of the FBD Hotels and Resorts Group where personal data may be shared with our Head Office or parent companies.
- relation to the management of our business where we may share your personal data with professional advisors in the areas of IT, Legal, Insurance, Banking etc.



International Transfers

Where we require your personal data to be processed outside of the EEA (European Economic Area) we will ensure that your data is protected under the Privacy Shield Regime. i.e. is afforded the same level of protection as the EU.

External links

Castleknock Hotel's website may contain links to other third-party sites, plug-ins and applications. Please take note that Castleknock Hotel is not responsible for, nor has any control over the privacy policies or practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy policies of each and every site that collects personally identifiable information. This privacy policy applies solely to information collected and processed by us.

Similarly, Castleknock Hotel is not responsible for, nor has any control over

(a) any personal data that you choose to provide to Applications or Software that is accessible on hardware that we make available to the guests of our hotel. E.g. at internet kiosks or interactive / SMART TVs.

(b) the privacy policies of the wifi operators at Castleknock Hotel.

Security of your information

Castleknock Hotel is committed to protecting the information we collect. When you enter personal data during the online reservation process, or during a customer email sign-up, your data is protected by Secure Socket Layer technology (SSL) to ensure safe transmission.

All site servers are configured with data encryption technologies and industry-standard firewalls to ensure our site is hosted in a secure environment.

Secure Reservations

If you decide to make an online reservation at the Site, you will be linked to a reservation interface and a third party booking engine provided by our booking management system vendor Net Affinity. All information sent to this site, if in an SSL session, is encrypted, protecting against disclosure to third parties.

Protecting your information

We would like our Site visitors to feel confident about using the Site to plan and purchase their accommodations, so Castleknock Hotel is committed to protecting the information we collect. Castleknock Hotel has implemented a security program to keep information that is stored in our systems protected from unauthorized access.

Measures have been put in place to ensure that your personal data can only be accessed where there is a business need for them to access same.



How long do we retain your information?

Personal Data provided by you as part of a booking on our website is retained on the booking system for a period of 30 days, after the date of the booking.

Personal Data provided by you that ultimately results in you becoming a customer of the business, is considered by us as being part of the books and records of the business which we are required under law to retain for a period of 6 years.

Generally, we will retain all personal data securely and for as long as is necessary to ensure that we comply with the relevant legislative environment that we in the Hotel and Leisure sector operate in.

Please note that if you consent to being contacted for marketing and promotion purposes, any personal information we use for this purpose will be processed by us until you notify us that you no longer wish to receive this information.

Your Rights

You have the right to

- request from us access to, rectification or erasure of your personal data or restrict processing concerning your data.
- withdraw consent for the processing of your personal data at any time, where relevant.
- object to the processing of your data as well as the right to data portability.
- have your personal data erased if we do not have a legitimate reason for processing same.
- You also have the right to lodge a complaint with The Data Protection Commission where you consider that the processing of your personal data by us infringes the General Data Protection Regulation 2018.

Policy Modifications

Castleknock Hotel reserves the right to change this Privacy Policy at any time. Please revisit our site from time to time to view any material changes to this policy.