



PRIVACY POLICY

We are committed to ensure that your privacy is protected and understand the need for appropriate protection of all information provided by you to us.

This privacy policy has been created in order that you understand the importance that we attach to this and our commitment to ensure that we comply with UK & EU legislation.

While this Policy is intended to describe the broadest range of our information processing activities, those activities may be more limited due to the restrictions of the law. To this extent, any of the activities described herein are not permitted under the law unless you agree to the remaining portions of this Policy and that it applies to the maximum extent permitted by law.

PERSONAL INFORMATION WE COLLECT

New Holmwood Hotel (referred to herein as "**NHH**," "**we**," and "**us**") may collect "**Personal Information**" from you, meaning information that identifies you as an individual or from which you may be identified. For example, we may collect:

- contact information, such as your name, mailing address, e-mail address, and telephone number;
- credit card number or other payment account number, billing address, and other payment and billing information ("**Payment Information**");
- Best Western Rewards® ("**BWR**") loyalty program member information, online user account details, profile or password details and any frequent flyer or travel partner program affiliation;
- records and copies of your correspondence if you contact us;
- information necessary to fulfil special requests (e.g., health conditions that require specific accommodation);
- date of arrival and departure, and goods and services purchased and;
- in limited cases, information relating to the credit of customers.

We may collect Personal Information from a variety of sources including:

- through the Site: -
- through reservation from affiliated call centres or other third parties;
- through social media and brand channels (e.g. Facebook, Twitter);

- when you otherwise voluntarily provide it to us, including relating to our loyalty program (i.e. BWR).

If you voluntarily share "Sensitive Information" (e.g., Personal Information related to your health) with us, that information will only be used as necessary to fulfil special requests (e.g. health conditions that require specific accommodations). For example, if you voluntarily convey a health-related need to us, we may store and use that information for us to provide a room with appropriate amenities. We do not collect or store Sensitive Information unless it is voluntarily provided by you. By providing such Sensitive Information, you expressly consent to our collection, processing and storage of that information in accordance with the terms of this Policy.

BEST WESTERN REWARDS® (“BWR®”) PROGRAM

To enrol in the BWR program, you must provide us with some of your Personal Information, such as your name, e-mail address, mailing address, and phone number, which is required to create and manage your account, administer the BWR program, and provide the benefits of the BWR program to you.

Enrolling in or maintaining a membership in the BWR program constitutes your acceptance of the BWR terms and conditions (available at www.bestwesternrewards.com) and your express written consent to all actions taken by us with respect to your Personal Information in compliance with this Policy. Your continued use of the Site after expiration of the BWR program constitutes your implied consent to all actions taken by us with respect to your Personal Information in compliance with this Policy.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

NHH collects Personal Information about guests, so that we can provide an experience that is responsive to the needs of such individuals. NHH may collect, use, and disclose Personal Information for one or more of the following purposes:

- Fulfilment of Reservation or Information Requests. To fulfil your requests such as completing a credit card transaction or booking a reservation through our reservation system, or responding to your requests that we send marketing, informational or other newsletters to you. For example, when you make a reservation we may collect Payment Information from you, and may use to fulfil your reservation.
- Membership Programs. To administer and operate voluntary membership programs, including loyalty programs such as BWR, which allow members to earn and redeem rewards, points, or credits relating to the programs. Read the complete [BWR program terms and conditions](#).
- Customer Care. To track, process, and respond to customer care inquiries and to enhance and improve the customer’s experience.
- Our Legal Duties. To comply with legal and regulatory requirements or demands in accordance with applicable law, a court order, summons, or other legal process.
- Terms of Use. We may enforce or apply our [Terms of Use](#) and/or other agreements and policies.

HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

- NHH. We may share your Personal Information with BWIK/BWI Subsidiaries so that they may use such Personal Information for the purposes described in this Policy. NHH are required to protect your Personal Information consistent with this Policy. NHH is the entity that is responsible for the management of such jointly used Personal Information.
- BWR Partners. NHH will only share your Personal Information with BWR program to allow you to earn and redeem rewards, points, or credits relating to your BWR membership and in accordance with your chosen earning and spending preferences (e.g., selection of a particular airline partner through which you can earn BWR points).
- Assignment. In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of NHH's or the NHH business, assets, or stock (including relating to any bankruptcy or similar proceedings), we may transfer any or all information that we collect pursuant to this Policy. Any successor, assignee, or transferee may use your Personal Information as described in this Policy.
- Social Networking Forums. NHH may make available interactive services (e.g., message boards, forums, and blogs) through which you may post information and materials on the Site. Please note that any information you disclose through such services becomes public information and may be available to visitors to the Site and to the public. We urge you to exercise discretion and caution when deciding to disclose your Personal Information, or any other information, through these services. If you choose to voluntarily disclose your personal Information through such a forum it may be available to the public and might be used by others for any purpose.
- Law Enforcement; Emergencies; Compliance. We may disclose your Personal Information: (i) when we have reason to believe that it is necessary to identify, contact, or bring legal action against persons or entities that may be causing injury to you, or NHH; (ii) when we believe that applicable law or regulation (including laws and regulations outside your country of residence) requires it; (iii) as mandated by summons, court order, or legal process; (iv) to establish or exercise our legal rights, defend against legal claims, or protect our operations; (v) to protect the rights, privacy, safety of NHH; (vi) to investigate, prevent, or take action regarding suspected illegal activities, (vii) to investigate, prevent, or take action regarding suspected fraud, (viii) to investigate, prevent, or take action regarding situations involving potential threats to the physical safety of any person, (ix) to investigate, prevent, or take action regarding violations of our [Terms of Use](#) or other agreements or policies, or (x) as otherwise required or permitted by law.

COOKIES

We may also collect information related to cookies. A cookie is a simple text file that is stored on your computer or mobile device by a website's server. It contains anonymous information, for example a unique identifier and the name of the website, as well as some numbers and digits. Cookies allow a website to remember your preferences, and items you have placed in your shopping cart. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. The "Help" function within your browser should tell you how to do this.

Alternatively, you can visit www.allaboutcookies.org, which gives comprehensive information on how to disable cookies on a wide variety of desktop browsers. If you disable or refuse cookies, please note that some parts of this Site may then be inaccessible or not function properly.

IP ADDRESSES

Your IP address is a number that your Internet Service Provider automatically assigns to the computer that you are using to access the Site. This number is identified and logged automatically in our server log files whenever users visit the Site, along with the time of each visit and the page(s) that were visited. Collecting IP addresses is standard practice on the Internet and is done automatically by many websites. We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, validation of a legitimate user session via Google® captcha and administering the Site. Please note that we treat IP addresses, server log files, and related information as Non-Personal Information, except when we are required to do otherwise under applicable law.

DO NOT TRACK

Your web browser may let you choose your preference as to whether you want to allow websites to collect information over time about your online activities across different websites or online services. At this time, the Site does not respond to such “Do Not Track” or similar preferences you may have configured in your web browser, and the Site may continue to collect information in the manner described in this Policy. However, as stated in the “Non-Personal Information” section above, we do allow you to exercise some choice in the information collected by adjusting your browser’s cookie settings.

SECURITY

Because the security of your Personal Information is important to us, we have implemented security measures that provide reasonable precautions against the unauthorized access, disclosure, alteration, or destruction of Personal Information. The Personal Information we collect from you online is stored by us and/or our service providers and protected through a combination of physical and electronic access controls, firewall technology, and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, access, misuse, or alteration of Personal Information. Where required by law, we will notify you of any such loss, access, misuse, or alteration of Personal Information that may affect you, so that you can take the appropriate actions to protect your rights. We may decide to notify you by mail, email, or telephone where permitted by law.

Please do not send us your Payment Information or Sensitive Information through e-mail or any undesignated area (e.g., submission of your credit card number in a "comment" field). If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the alleged problem by contacting our reception as set forth below in this Policy. Please note that, if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the alleged problem.

PRIVACY BY DESIGN

Employee access to information:

Your information is disclosed to employees on a ‘need to know’ basis and we confirm that all such persons understand the importance of client confidentiality and privacy. Access to the hotel PMS system is by login and password entry only.

YOUR CHOICES

You may always choose what Personal Information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected. For example, we cannot take a reservation without a name, and if we cannot disclose your Personal Information to BW, we may be unable to provide you with all or certain reservation services, other services, or membership-program-related benefits. Similarly, if we cannot disclose your Personal Information to other third parties, such as BWR partners (e.g., airlines, card issuers and other third parties), we may not be able to provide all the available membership program services to you (e.g., earning of frequent customer points with such companies), or the provision of such services may be delayed). We will endeavour to comply with your request as soon as reasonably practicable.

In some jurisdictions, data privacy or other laws may require us to obtain your consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g., where communications are required to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may be required to seek your consent expressly (e.g., where the information collected is regarded to be Sensitive Information under UK regulations).

If you do not wish for us to use your contact information to promote our own or third parties' products or services, you can opt-out of any or all such promotional communications or withdraw your previous consent by contacting our Reception as set forth in the “Contacting Us” section of this Policy below.

If you have a BWR account, BWUK ask you to indicate your communication preferences at the time you become a member of the BWR program. Once you have indicated your preferences, you can change them by logging into your account.

Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of Licensed Hotels, Affiliates, or other third parties with which they have already shared your Personal Information.

ACCESS AND MODIFICATION RIGHTS

You may have the right to request, deletion or changes to the Personal Information we maintain about you and, where appropriate, request that we update such Personal Information you believe is incomplete, inaccurate or out of date.

DATA RETENTION

NHH only collects Personal Information that it believes is necessary to perform the services that you seek from NHH and to exercise its rights and comply with its obligations as otherwise outlined in this Policy. We will keep your Personal Information only if we need it for the purposes for which we collect it or as otherwise permitted by law.

CONTACTING US

If you have any questions regarding this Policy, or would like to update your information or modify your communication preferences, please contact us by e-mail at reception@newholmwoodhotel.co.uk , by phone at 01983 292508, or write to us at the following address:

New Holmwood Hotel
Queens Road
Egypt Point
Cowes
Isle of Wight
PO31 8BW

Please note that e-mail communications will not necessarily be secure; accordingly, you should not include Payment Information or Sensitive Information in your e-mail correspondence to us.