

Axiom Customer Privacy Policy

Our Commitment to Protecting Your Privacy

Axiom Hospitality are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018. We know that you care how information about you is used and shared. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely. This privacy policy describes the type of personal information that we may collect about you when you stay at our hotel or join our leisure club, how we use any personal information, the circumstances in which we may share the information and the steps we take to safeguard the information to protect your privacy.

We have published this notice to help you understand:

- how Axiom Hospitality uses your personal data;
- who we share your information with, why and on what basis;
- and what your rights are.

If we make changes to this notice we will notify you by updating it on our website.

"Personal data" means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number). Before providing us with this information, we recommend that you read this document describing our customer privacy protection policy. This Customer Privacy Policy forms part of the terms and conditions that govern our hotel and leisure club services.

What Personal Data We Collect

Hotel Customers

At various times, we will be obliged to ask you, as a hotel customer, for information about you and/or members of your family, such as:

- Contact details (for example, last name, first name, telephone number, address, email)
- Personal information (for example, date of birth, nationality)
- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Your membership number if you are a member of our loyalty program
- Your arrival and departure dates
- Your preferences and interests (for example, smoking or non-smoking preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests)
- Your questions/comments, during or following a stay in one of our hotels
- The information collected in relation to persons under 18 years of age is limited to their name, nationality and date of birth, which can only be supplied to us by an adult
- Our hotels use CCTV for safety and security monitoring purposes

Personal data of hotel customers may be collected on a variety of occasions, including:

- Hotel activities:
- Booking a room
- Checking-in and paying

- Eating/drinking at the hotel bar or restaurant during a stay
- Requests, complaints and/or disputes
- Transmission of information from third parties:
 - Tour operators, travel agencies, reservation systems, and others
- Internet activities:
 - Connection to hotel websites (IP address, cookies)
 - Online forms (online reservation, questionnaires, hotel pages on social networks, network login devices such as Facebook login etc.)

Leisure Club Members

When you join the leisure club as a member, you are entering into a membership contract agreement with us, a copy of the terms & conditions for which you can find on the leisure club website. To enable us to set-up your membership and to help us improve your leisure club experience we will ask you to provide some personal information which may include

- Contact details (last name, first name, telephone number, email)
- Date of birth
- Bank account details (for direct debit memberships)
- Photograph
- Health Information
- Our leisure clubs use CCTV for safety and security monitoring purposes.

How Do We Use Your Information

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement
- Consent - where you agree to us using your information in this way e.g. for sending you information on hotel or leisure club promotions
- Legitimate Interests - this means the interests of Axiom Hospitality in managing our business to allow us to provide you with the best service
- Legal Obligation - where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes

We use your information in a number of different ways, primarily to fulfil a contract and also provide excellent service to our customers.

Hotel Customers

The table below set this out in detail, showing what we use the information we collect for:

Contact Details	<ul style="list-style-type: none"> To manage the reservation of rooms and accommodation requests and other hotel services To manage your stay at the hotel, room lists, restaurant bookings, special requests and services To monitor your use of hotel services. To manage invoicing and payment records Carrying out surveys and analyses of questionnaires and customer comments Managing claims/complaints Offering you the benefits of our loyalty program Managing access to rooms Monitoring your use of services
Personal Information	<ul style="list-style-type: none"> To improve hotel services, to input to our marketing programme To assist promotion of our services, and adapting our products
Information relating to your children	<ul style="list-style-type: none"> Only supplied by an adult Used to manage their stay at the hotel
Credit Card Number	<ul style="list-style-type: none"> Managing the reservation of rooms, accommodation requests and to take payment
Loyalty Membership Number	<ul style="list-style-type: none"> Managing our relationship with customers before, during and after your stay Knowing and managing the preferences of new or repeat customers Managing the loyalty program and supply rewards Providing details for the customer database Developing statistics and commercial scores, and carrying out reporting
Arrival and Departure dates	<ul style="list-style-type: none"> To manage your hotel booking
Preferences and Interests	<ul style="list-style-type: none"> To enhance customers, stay at our hotel and to customise and improve the services we offer
Questions / Comments	<ul style="list-style-type: none"> To collect feedback to improve our services and monitor customer experience

Leisure Club Members

The table below set this out in detail, showing what we use the information we collect for:

Contact Details	<ul style="list-style-type: none"> To manage the membership application and administration of your club membership To verify your membership status To manage payment records Carrying out surveys and analyses of questionnaires and customer comments Managing claims/complaints Offering you the benefits of our loyalty program To carry out obligations arising from membership contractual agreements To facilities booking of a class
Personal Information	<ul style="list-style-type: none"> To improve services, to input to our marketing programme. For demographic profiling of our customer base, to assist promotion of our services, and adapting and improving our products and services
Bank Account Details	<ul style="list-style-type: none"> If you are paying for your membership via monthly direct debit we will collect and securely store your bank account information for membership administration purposes
Photograph	<ul style="list-style-type: none"> In the interests of security and the prevention of crime, we may take a digital photograph of each member to whom a membership card is issued To identify you as a club member By providing the digital photograph to us, you are consenting to our using it in the manner set out in this Policy
Membership Number	<ul style="list-style-type: none"> To manage your access to the club To monitor your usage of the club to assist us to supporting you achieve your exercise and health goals
Sensitive Information	<ul style="list-style-type: none"> As part of the gym induction process, at your discretion you may also share with us information about your general health and medical conditions This information is used to inform the prescription of an appropriate exercise programme By providing sensitive information to us, you are consenting to our using it in the manner set out in this Policy
Questions / Comments	<ul style="list-style-type: none"> To collect feedback to improve our services and monitor customer experience

Your Rights

You are entitled to request the following from Axiom Hospitality, these are called your Data Subject Rights and there is more information on these on the Information Commissioners website www.ico.org.uk

- THE RIGHT TO BE INFORMED – The right to be informed about how your personal information is being used and processed (as described in this policy)
- RIGHT OF ACCESS – The right to access the personal information we hold about you
- RIGHT TO RECTIFICATION – The right to request the correction of inaccurate personal information we hold about you and to have incomplete personal information completed
- THE RIGHT TO ERASURE (also known as the Right to be Forgotten) - The right to request that we delete your data, or stop processing it or collecting it, in some circumstances
- RIGHT TO RESTRICTION OF PROCESSING – to restrict processing of your personal information
- RIGHT TO DATA PORTABILITY - to electronically move, copy or transfer your personal information in a standard form, or port elements of your data either to you or another service provider
- RIGHT TO OBJECT – The right to object to processing of your personal information
- THE RIGHT TO STOP DIRECT MARKETING messages, and to withdraw consent for other consent-based processing at any time
- THE RIGHT TO COMPLAIN to your data protection regulator - in the UK, the Information Commissioner's Office. We encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have

If have any general questions about your rights or if you want to exercise your rights or have a complaint, please contact us, details in the contact us section at the end of this document

Who We Share Your Information With and Why

Within Axiom Hospitality, in order to offer you the best service, we can share your personal data and give access to authorised employees including:

- Hotel staff
- Reservation staff
- IT departments
- Commercial partners and marketing services
- Legal services if applicable
- Generally, any appropriate person within Axiom Hospitality for certain specific categories of personal data

Information about our hotel guests and leisure club members are an important part of our business and we do not sell this information to others. Axiom Hospitality works with a number of trusted suppliers, agencies and businesses in order to provide you the high quality services you expect from us. Your personal data may be sent to a third party for the purposes of supplying you with services and improving your stay or leisure club membership experience. Some examples of the categories of third parties with whom we share your data are:

Booking Partners

Axiom Hospitality works with a number of trusted partners who take hotel bookings and manage reservation systems on our behalf. All partners are subject to thorough security checks, and will only hold the minimum amount of personal information needed in order to fulfil the bookings you make on our behalf.

IT Companies

Axiom Hospitality work with business who support our website and other business systems.

Marketing Companies

We work with marketing companies who help us manage our electronic communications with you or carry out surveys and reviews on our behalf. If customer have opted-in to receiving information regarding our goods and services we may utilise a marketing company to send out such information. For further information see the 'Keeping in touch with you' section of this policy.

Payment Processing

Axiom Hospitality work with trusted third party payment processing providers and banks in order to securely take and manage payments.

Debt Recovery and Fraud Prevention

We release your personal information on the basis that we have a legitimate interest in preventing fraud and money laundering, when we believe release is appropriate to comply with the law; enforce or apply our contractual agreements; or protect the rights, property or safety of Axiom Hospitality or our customers. This includes exchanging information with other companies and organisations for verification of identity fraud protection, credit risk reduction and debt collection.

Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Local Authorities

We may also be obliged to send your information to local authorities if this is required by law or as part of an inquiry and in accordance with local regulations.

Business Transfers

As we continue to develop our business, we might sell or buy hotels or leisure clubs. In such transactions, hotel guest and leisure club member information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the customer or member consents otherwise).

Also, in the unlikely event that Axiom Hospitality or substantially all of its assets are acquired, personal information will be one of the transferred assets.

Website

To improve our platform, prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical, research or other functions on our behalf.

Outside the UK

Whenever we transfer personal information to countries outside of the European Economic Area in the course of sharing information as set out above, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

Keeping Your Information

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 5 years after the date it is no longer needed by us for any of the purposes listed under the 'How we use your information' section within this policy.

The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- In limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period

How We Secure Your Information

Axiom Hospitality take data security seriously, and we take appropriate technical and organisational procedures, in accordance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorised access or disclosure.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

Our information security policies and procedures are aligned with widely accepted international standards, we apply the controls detailed in the Payment Card Industry Data Security Standard to all environments storing personal data. These standards are applied and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

To this end, we have taken technical and organisational measures.

Technical Measures:

- We have taken technical measures such as firewalls and encryption of computer and mobile device systems
- When personal data is transferred encryption technology is used
- When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access
- User ID / Password systems and procedures

Policies & Procedures:

- We have measures in place to protect against accidental loss and unauthorized access, use, destruction, or disclosure of data
- We place appropriate restrictions on the levels and type of access to personal information and have organisational measures such as user IDs / passwords to control staff access to personal data in line with their job requirements
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
- We conduct Privacy Impact Assessments in accordance with legal requirements and our business policies
- Training for employees and contractors
- We require privacy, information security, and other applicable training on a regular basis for our employees who have access to personal information and other sensitive data
- We take steps to ensure that our employees and contractors operate in accordance with our

information security policies and procedures and any applicable contractual conditions

- We require, through the use of contracts and security reviews, our third-party vendors and providers to protect any personal information with which they are entrusted in accordance with our security policies and procedures

Keeping In Touch With You

We want to keep our customers up to date with information about special offers, benefits and improvements to our facilities and services.

When you engage with our marketing activities, or join our leisure clubs, either electronically on-line via website or social media for example, or in person at the hotel, we will ask you if you want to opt-in to receive this type of promotional information. If you have consented to receive marketing, you may opt out at a later date.

If you decide you do not want to receive this marketing information you have the right to ask us not to process your personal information for marketing purposes. You can request that we stop contacting you for marketing purposes by emailing info@axiomhospitality.com or via the unsubscribe link within any marketing Email or SMS which you receive. You may continue to receive marketing information for a short period while your request is dealt with.

Axiom Hospitality will not share your information with outside companies for their marketing purposes.

We reserve the right to contact our hotel customers or leisure club members as necessary to fulfil the obligations and administration of our service. We will also communicate as deemed appropriate by Axiom Hospitality in regards to any changes to the product, services and facilities of the hotel or leisure club which may impact on you.

Cookies

This section is designed to help you understand what cookies are, how Axiom Hospitality uses them and the choices you have in regards to their use.

What are Cookies?

Cookies are small data files that are transferred to your computer's web browser to enable our systems to recognise your browser and to collect information from your computer such as your IP address and other details about your computer which are collected by our web server, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Are Cookies Safe?

Yes - Cookies are not harmful and do not contain any information such as your home address, date of birth or credit card details. The information stored in cookies is safe and anonymous to any external third party, and your account security is never compromised.

There are four main types of cookies – here's how and why we use them:

- Site functionality cookies – these cookies allow you to navigate the site and use our features.
- Site analytics cookies – these cookies allow us to measure and analyse how our customers use the site, to improve both its functionality and your shopping experience.
- Customer preference cookies – when you are browsing, these cookies will remember your preferences (like your language or location), so we can make your experience as seamless as possible, and more personal to you.
- Targeting or advertising cookies – these cookies are used to deliver ads relevant to you. They also limit the number of times that you see an ad and help us measure the effectiveness of our marketing campaigns.

By using our site, you agree to us placing these sorts of cookies on your device and accessing them when

you visit the site in the future.

Can I Turn Off Cookies?

Yes – To change your cookie settings, or if you want to be notified each time a cookie is about to be used, you should amend the settings provided in your web browser to prevent us from storing cookies on your computer hard drive. For information on how to have your browser notify you when you receive a new cookies and how to disable or delete cookies, please consult the "Help" tab of your browser via the menu bar.

Further information about cookies can be found at <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>. Please note that by deleting or disabling future cookies, your user experience may be affected, and you might not be able to take advantage of certain functions of our site.

Because cookies allow you to take advantage of some of website's essential features, we recommend that you leave them turned on.

Website visitors who don't want their data used by Google Analytics can install the Google Analytics opt-out browser add-on. To opt-out of Analytics for the web, visit the Google Analytics opt-out page and install the add-on for your browser. Web site visitors can also opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the google Ad Settings.

Changes to How We Protect Your Privacy

We may change or update this Privacy Policy from time to time, to reflect how we are processing your data. If we make significant changes, we will make that clear on our website, or by some other means of contact such as email, so that you are able to review the changes before you continue to use our services.

Access

You have the right to access your personal data collected by Axiom Hospitality and to modify it subject to applicable legal provisions. Should you need to contact us if you have any questions about this notice, would like us to stop using your information, want to exercise any of your rights as set in this Privacy Policy, or have a complaint; please email us at: info@axiomhospitality.com

Or if you prefer you can write to us at:

Data Privacy Department
Axiom Hospitality
21 Piccadilly
Mayfair
London
W1J 0BH

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to include a copy of two official pieces of identification, such as a driver's license or passport, along with your request.

If your personal data is inaccurate, incomplete or not up to date, please send the appropriate amendments to the Data Privacy department as indicated above.

All requests will receive a response as swiftly as possible and in accordance with applicable law.