

AXIOM CUSTOMER PRIVACY POLICY

INTRODUCTION

Welcome to Axiom Hospitality Limited's (the **"Company"**, **"we"** or **"us"**) privacy policy.

The Company is committed to complying with data protection legislation, including its data protection obligations. 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.

Privacy Policy Content:

1. IMPORTANT INFORMATION AND WHO WE ARE
2. THE PERSONAL DATA WE COLLECT ABOUT YOU
3. HOW IS YOUR PERSONAL DATA COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. DATA SECURITY
7. DATA RETENTION
8. YOUR OBLIGATIONS AND RIGHTS
9. COOKIES
10. KEEPING IN TOUCH WITH YOU

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy describes the type of personal information that we may collect about you when you stay at any of our managed properties or join a leisure club at one of our managed properties, how we use any personal information, the circumstances in which we may share the information, the steps we take to safeguard the information to protect your privacy and what your rights and obligations are.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

The Company is the controller and is responsible for your personal data.

We have appointed a data protection officer (**"DPO"**). If you have any questions about this privacy policy or our data protection practices please contact the DPO using the following contact details:

Axiom Hospitality Limited
Data Protection Officer
21 Piccadilly, London, England, W1J 0BH

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

Changes to the privacy policy

We keep our privacy policy under regular review. When we amend our privacy policy in a material way, we will post an announcement on our website, along with the updated privacy policy. This version was last updated on 21 October 2022. Historic versions can be obtained by [contacting us](#).

Third-party links

Our website may include links to third-party websites, plug-ins, applications, products and services. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements and practices. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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). It does not include data where the person's identity has been removed (anonymous data) ("**Personal Data**").

Before providing us with this Personal Data, we recommend that you read this document describing our customer privacy protection policy. This privacy policy forms part of the terms and conditions that govern the hotel and leisure club services of our managed properties.

What Personal Data does the Company collect?

We may collect, use, store and transfer different kinds of Personal Data about you in relation to your stay at one of our managed properties or your membership of our leisure clubs which we have grouped together as follows:

- **Identity Data** includes the first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender of you and members of your family/booking group.

This may include information relating to your children (for example, first name, date of birth and nationality). We will only obtain any data relating to persons under 18 years of age from an adult. The Company does not knowingly collect any other data relating to children. If we discover that we have collected data relating to children, the information is deleted.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you, your arrival and departure dates, your membership number and other details of services you have purchased from us.
- **Technical Data** includes internet protocol ("IP") address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our services.
- **Profile Data** includes your username and password, purchases or instructions given by you, your interests, preferences (for example, smoking or non-smoking, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests), health information (for leisure club members), feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Image Data:** includes photograph data (for security, monitoring and identification purposes) and CCTV footage of visits to our sites or online meetings.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any

purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

Special Categories of Personal Data

Some special categories of particularly sensitive Personal Data, such as information about health or medical conditions, racial or ethnic origin or sexual orientation require higher levels of protection. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of Personal Data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of Personal Data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Situations in which we will use your sensitive Personal Data

In general, we will not process particularly sensitive Personal Data about you unless it is necessary for performing or exercising obligations or rights in connection with the provision of a service to you. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive Personal Data are listed below. We have indicated the purpose or purposes for which we are processing or will process your more sensitive Personal Data.

We will obtain and use information about your physical or mental health, or disability status as follows:

- as part of the gym induction process, at your discretion you may share with us information about your general health and medical conditions;
- to ensure your safety when using our leisure club;
- to assess and prescribe an appropriate exercise plan; and
- to assess your health goals and aid you in achieving such goals.

We need to process this Personal Data for the following purposes:

- to provide the best service to you by offering tailored advice and support and by continually review the services offered to you.
- to fulfill our contractual obligations to you.
- to activate and continue your club membership.
- to ensure your safety and to comply with our legal obligations.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you do any of the following:
 - sign our terms and conditions or contract, including booking a hotel room or signing up to our leisure club membership;
 - Checking in, checking out and making payments;
 - Using the facilities in our managed properties;
 - create an account on our website;
 - interact with our website and social media pages (such as Facebook, Twitter and Instagram);
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties and public sources as follows:
 - (a) analytics providers such as Google based outside the UK.
 - (b) search information providers such as LinkedIn based inside or outside the UK.
 - (c) advertising networks.
 - (d) Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal based inside or outside the UK.
 - (e) Identity and Contact Data from data brokers or aggregators such as Direct Marketing Agencies based inside the UK.
 - (f) Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - (g) Identity and Contact Data from Tour operators, travel agencies, reservation systems, and other providers used in order to facilitate the provision of services to you.

4. HOW DO WE USE YOUR PERSONAL DATA?

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- **Contract** – your Personal Data is processed in order to enter into or fulfil a contractual arrangement between the Company and you.
- **Consent** - where you agree to us using your information in this way e.g. for sending you information in relation to hotel or leisure club promotions.
- **Legitimate Interests** - this means the interests of the Company in conducting and managing our business to allow us to provide you with the best service. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent

or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

- **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.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Hotel Customers

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer of the hotel, manage the reservation of rooms and accommodation requests and other hotel services.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage your stay at the hotel, room lists, restaurant bookings, special requests and services and to monitor your use of the hotel services.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver your instructions including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a customer satisfaction or market research survey to improve our services and monitor customer experience (c) Requesting information relating to your preferences and interests to enhance the customer experience at our hotel and to customise and improve the services we offer	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

(d) Managing claims and complaints (e) Offering you the benefits of our loyalty program		
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor or record calls, emails and other correspondence	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/ services and training and quality monitoring)

Leisure Club Members

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage your access to and membership of the leisure club, including:</p> <ul style="list-style-type: none"> (a) Membership application (b) Membership administration (c) Payment details (d) Membership verification (recurring basis) (e) Membership number for access to the club (f) Providing facilities for booking classes (g) Photograph and CCTV data for security and fraud prevention purposes 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
<p>To process and deliver your instructions including:</p> <ul style="list-style-type: none"> (a) Manage payments, fees and charges (b) Collect and recover money owed to us 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a customer satisfaction or market research survey to improve our services and monitor customer experience (c) Requesting information relating to your preferences and interests to improve the services we offer (d) Managing claims and complaints (e) Offering you the benefits of our loyalty program (f) Monitoring your use of the club's facilities to assist us to supporting you achieve your exercise and health goals 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor or record calls, emails and other correspondence	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/ services and training and quality monitoring)

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. DISCLOSURES OF YOUR PERSONAL DATA

WHO DO WE SHARE YOUR PERSONAL DATA WITH AND WHY?

In order to offer you the best service and for the purposes set out above, we may share your Personal Data with and give access to authorised internal and external third parties including:

- Hotel staff
- Reservation staff
- IT departments
- Commercial partners and marketing services
- Legal services (if applicable)
- Generally, any appropriate person within the Company for certain specific categories of Personal Data
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy.

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. The Company works with a number of trusted suppliers, agencies and businesses in order to provide you with the high-quality services that 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 as follows:

Booking Partners

The Company 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 Data needed in order to fulfil the bookings that you make on our behalf.

IT Companies

The Company works with businesses who support our website and other business systems. Your Personal Data may be provided to these businesses only where strictly required and permitted by law.

Marketing Companies

The Company works with marketing companies who help us manage our electronic communications with you or carry out surveys and reviews on our behalf.

If you 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

The Company works 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 Data 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 the Company 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 Data that will be processed include, for example: name, address, date of birth, contact details, financial information, device identifiers including IP address and vehicle details.

We may also enable law enforcement agencies to access and use your Personal Data to detect, investigate and prevent crime.

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.

International transfers

We may share your Personal Data with our internal/external third parties that are based outside the UK, so their processing of your Personal Data will involve a transfer of data outside the UK.

Whenever we transfer your Personal Data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give Personal Data the same protection it has in the UK.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

We may disclose your Personal Data if required by law, such as for litigation or a request or summons from public or governmental authorities within or outside of your country of residence. We may also disclose information about you if we determine that for purposes of national security, law enforcement, legal compliance, or other issues of public importance, disclosure is necessary or appropriate. We may disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions, or other contractual or legal rights, or to protect our operations or employees.

6. DATA SECURITY

The Company takes data security seriously and has put in place appropriate technical, administrative and organisational security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Our security measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights, management systems and processes, careful selection of processors and other technically reasonable measures to provide appropriate protection for your Personal Data against unauthorised access or disclosure.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage

and disclosure of Personal Data. Where appropriate, we may also take backup copies and use other such measures to prevent accidental damage or destruction to your Personal Data.

Where online transactions are supported on our website, we use an industry standard security measure, such as '**Secure Sockets Layer**', to protect the confidentiality and security of online transactions.

In addition, we place appropriate restrictions on the levels and type of access to Personal Data (via user IDs and passwords) to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We regularly conduct Privacy Impact Assessments in accordance with legal requirements and our business policies.

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. All employees and contractors who have access to Personal Data and other sensitive data are required to undertake privacy, information security, and other applicable training on a regular basis.

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.

7. DATA RETENTION

How long will you use my information for?

The Company will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by [contacting us](#).

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

The only exceptions to this retention policy are where:

- the law requires us to hold your Personal Data 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 Data, in which case we will retain your Personal Data 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 Data for a longer or shorter period.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely

without further notice to you.

8. YOUR OBLIGATIONS AND RIGHTS

Your duty to inform us of changes

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Your rights in connection with Personal Data

Under certain circumstances, by law you have the right to:

- **Request Information** about how your Personal Data is being used and processed.
- **Request access** to your Personal Data (commonly known as a data subject access request). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
- **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request the restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your Personal Data to another party.
- **Complain** at any time to the Information Commissioner's Office with respect to data protection issues. We encourage you to [contact us](#) before making any complaint and we will seek to resolve any issues or concerns you may have.

If you want to review, verify, correct or request erasure of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact the DPO in writing.

Request fees

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). You may be asked to provide a copy of an official identity document, such as an identity card or passport, to support any request. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Cookies help us to deliver a better website experience to you. Your unique cookie tells us if and when you revisit our website, so we can recall which sections of our website you have previously visited and eliminate the need for you to enter your password frequently during a visit.

Cookies are also used for website traffic analysis and anonymous demographic profiling so that we may improve our services.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Provider	Type	Source	Expiry	Purpose
PHPSESSID	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	Session	Preserves user session state across page requests.
ga-disable-UA-*	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	1 year	This cookie is set to disable Google Analytics.
cookie-disable	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	1 year	This cookie is set to track whether user has agreed to a cookie pop-up.

_ga	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	2 years	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gat	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	Session	Used by Google Analytics to throttle request rate.
_gid	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	Session	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_gali	https://www.axiomhospitality.com/	HTTP	https://www.axiomhospitality.com/	Session	--

We may also use web beacons (also known as **'clear gifs'** or **'pixel tags'**) in connection with some websites. However, we do not use them to identify individual users personally. Web beacons are tiny graphics embedded on a website to count visitors to a website, to access certain cookies and/or to help us measure the effectiveness of particular content.

We may also include web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on. This information is used to improve our services.

You have a choice with respect to cookies. By modifying your Internet browser preferences, you have the ability to accept all cookies, to be notified when a cookie is set, or to reject all cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website. If cookies are turned off, you may not be able to view certain parts of the website which may enhance your visit. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however, continue to collect information of visits from your IP address, but such information will no longer be unique.

Please note that some of our business partners or third parties such as advertising networks and providers of external services like web traffic analysis services, whose content is linked to the Axiom Hospitality Limited website may also use cookies or web beacons. However, we have no access to or control over these cookies. These third-party cookies are likely to be analytical, performance or targeting cookies.

Further information about cookies can be found at <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>.

10. KEEPING IN TOUCH WITH YOU

Marketing

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

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 our website or social media, or in person at the hotel, we will ask you if you want to opt-in to receive this type of promotional information.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any company outside of the Company for marketing purposes.

Opting out

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 Data for marketing purposes. You can request us or third parties to stop contacting you for marketing purposes at any time 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.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a service purchase, service experience or other transactions.

Other Communications

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 the Company in regards to any changes to the product, services and facilities of the hotel or leisure club which may impact on you.

Should you need to contact us if you have any questions about this privacy policy, 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. If you prefer, you can [write to us](#)