



Privacy Notice

Purpose of this Privacy Notice

Kilmurray Lodge Hotel Ltd trading as 'Kilmurry Lodge Hotel', 'we', 'us' or 'our') respects your privacy and are committed to protecting your Personal Data.

This Privacy Notice provides information on how we collect and process your data. Your data is collected and processed when you visit our hotel, use our website ('the website') (including any data which you may provide the website), when you contact us to provide feedback or when you make a complaint.

This Privacy Notice ("Notice") together with any disclaimers sets out the basis on which any personal data we collect from you or that you provide to us, or that is provided to us relating to you ("Personal Data") by any means will be processed. Please read the following carefully to understand our use of personal data. Please note that this Privacy Notice relates exclusively to personal data directly related to a living natural person and not to persons in any other capacity. This Privacy Notice is provided to you, in line with the following Personal Data Protection Legislation:

- The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 also known as the General Data Protection Regulation (GDPR), which became enforceable across the EU and the EEA from May 25th, 2018 having replaced the previous Directive 95/46/EC; In Ireland, the national law, which amongst other things, gives further effect to the GDPR, is the Data Protection Act 2018 ('the 2018 Act').
- The Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 also known as the ePrivacy Directive, amending the Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services, Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector and Regulation (EC) No 2006/2004 on cooperation between national authorities responsible for the enforcement of consumer protection laws.



Controller

Kilmurry Lodge Hotel Ltd trading as Kilmurry Lodge Hotel is the Data Controller of, and responsible for, your personal data processed through the use of our website and any personal data processed when visiting our hotel

Contact Detail

If you have any questions about this Privacy Notice or our privacy practices, including any requests to exercise your legal rights, contact privacy@kilmurrylodge.com

At any time, you have the right to make a data protection complaint to the relevant supervisory authority. However, we do request that in the first instance to you contact us to provide us with an opportunity to resolve the matter.

If we have been unable to resolve your concerns and you wish to lodge a complaint with a supervisory authority, you can do so to the Data Protection Commission (www.dataprotection.ie).

The data which we collect about you.

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity data** includes first and last names, images captured on CCTV , passports and national id cards, gender, date of birth.
- **Contact data** includes postal address, e-mail address and telephone number(s).
- **Health data** you supply to us, such as wheelchair access needs, as part of your booking
- **Financial data** includes card-holder's name, card type, card number, issue date (not mandatory), expiry date, issue number and CVV number.
- **Transaction data** includes details about payments for our products or services, room preferences, arrival times, dietary requirements, additional guest names, airline details, vehicle details.
- **Technical data** includes internet protocol (IP) addresses, location data (location data is required for certain technical functions to work correctly), browser plug-in types and versions, information regarding the operating systems, platforms and other similar technologies on devices used to access or website, or to install/uninstall our apps. See our Cookie Notice for further details.
- **Usage data** includes information about how you use our website, and other services..



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 be unable to perform the contract we have entered or are seeking to enter into with you (e.g., to complete a booking). This may result in cancellation of the product/service you have ordered from us. If this is the case, we will notify you.

How is your personal data collected?

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

- **Direct interactions** – including any information you provide to us when booking into or visiting our hotel, purchasing food and drinks in our hotel, or lodging a complaint.
- **Automated technologies or interactions** – as you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this data using cookies and other similar technologies. See our Cookie Notice for further details.
- **Third parties or publicly available sources** – we receive personal data about you from various third parties and public sources, as set out below:
 - Technical data from analytics providers, such as Google, based outside of the European Economic Area (EEA).
 - Contact, financial and transaction data from providers of technical, payment and delivery services, such as Booking.com

We will only use your personal data as permitted by law. Most commonly, we will use your personal data in the circumstances where:

- We need to perform the contract into which we are about to enter/have entered into with you.
- It is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- We need to comply with a legal or regulatory obligation.
- Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time. Any processing that we have carried out before you withdrew your consent remains lawful.

Marketing

We may seek to send you electronic or telephonic marketing communications which we consider to be of interest to you. You will be asked to opt-in if you wish to receive these. If you wish to be removed from our list (opt-out) at any time, you can do so by clicking on the unsubscribe link at the bottom of each communication you receive from us. You can also opt out by contacting us at info@kilmurrylodge.com



What information about you do we obtain from others?

When you use our services, we may obtain the certain categories of personal data from others Booking sites, Travel Agents and/or your family members/next of kin.

Children's Data

We do not knowingly collect, disclose, or sell personal information of individuals under the age of majority in their respective jurisdiction without permission from a minor’s parent or guardian. When searching for hotel reservations you may be asked to provide the ages of any minor guests staying in the room. We collect this information for the purpose of determining room rates where applicable.

Purposes for which we will use your personal data.

The table below describes the purposes for which we may use your personal data alongside the corresponding legal basis for data-processing.

Purpose/activity	Type of Data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer and book your hotel room	(a) Identity (b) Contact (c) Transaction	Performance of a contract with you
To process and deliver your hotel booking and your food and drinks order or table booking, including: (a) Managing payments, fees, and charges (b) Collecting and recovering money owed to us (c) Sending receipts to you	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)



<p>To enable you to:</p> <p>(a) Correspond with us via post, phone, e-mail or otherwise</p> <p>(b) Provide feedback, submit a subject access request, or lodge a complaint</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to obtain feedback from our customers, process complaints and grow our business around our customers' needs)</p>
<p>To use application improvement analytics to improve our website, products/services</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to keep our website updated/relevant and to develop our business). Google analytics used only on consent.</p>
<p>Log information – for booking history and troubleshooting</p>	<p>(a) Identity</p> <p>(b) Technical</p> <p>(b) Usage</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to help resolve problems)</p>
<p>Checking and verifying your identification for the prevention of crime and disorder</p>	<p>(a) Identity</p>	<p>(a) Compliance with legal and regulatory requirements</p>
<p>CCTV recording in the communal areas of our hotels to ensure the safety of our employees and customers</p>	<p>(a) Identity</p>	<p>(b) Compliance with our legal and regulatory obligations and for the prevention of crime and disorder</p>

Cookies

You can set your browser to refuse browser cookies or to alert you when websites set or access cookies. Please note that if you disable or refuse cookies, some parts of our website or apps may become inaccessible or may not function properly. For more information about the cookies we use, see our Cookie Notice

Change of Purpose

We will use your personal information only for the purposes we collect it for. We may use your data for other purposes where we reasonably believe this is necessary and only where this is aligned with the original purpose.



Disclosures of your Personal Data

We may share your personal data with third-parties who provide our services. For example, our web hosting provider and our booking service providers.

In addition, we may disclose your personal information to third parties if we are under a duty to disclose or share your information. This can be in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share your information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them or you.
- Third parties with whom:
 - (i) we need to share your information to facilitate transactions you have requested, and
 - (ii) you ask us to share your information.
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities in order to comply with any applicable laws, grant applications and / or court orders.
- Service providers who provide us with marketing including Wi Fi services, website and online platforms, subcontractors who provide a service to us, and sub processors.

We attach at **Schedule 1** a list of some of the entities with whom your personal data is shared. A full list is available on request.

We do not allow our third-party processors to use your personal data for their own purposes. They are only permitted to process your personal data for specified purposes and in accordance with our instructions.

Any payment transactions carried out by us, or our chosen third-party provider will be encrypted.

International Transfers

We will make use of services provided by third parties for the delivery of our services. This may necessitate the transfer of personal data outside the EU/EEA. To illustrate, we use a variety of cloud-based tools such as Microsoft Office 365 and Google. Where Personal Data needs to be transferred or processed outside the EU/EEA, we chose providers who process Personal Data on the basis of:

- Standard Contractual Clauses
- An Adequacy Decision from the European Commission.

If you want further information on the specific mechanism used by us, if your data is transferred outside of the EEA, please contact us.



Data Security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, altered, disclosed, or accessed/used in an unauthorised way. In addition, we limit access to your personal data only to those employees, agents, contractors and other third parties with a genuine business need to know. They will process your personal data only upon our instruction and are subject to a duty of confidentiality.

We have implemented procedures to deal with any suspected personal data breach. Where legally required to do so, we will notify you (and any applicable regulator) of a breach if one should occur.

Data Retention

For how long will you use my personal data?

We will retain your personal data only for as long as necessary to fulfil the purposes we collected it. This includes for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

In some circumstances, you can ask us to delete your data. Please see 'Your Legal Rights' below for further information.

Your Legal Rights

As an individual under EU law you have certain rights to apply to us to provide information or make amendments to how we process your Personal Data. These rights apply in certain circumstances. You have the right to:

1. Access Personal Data relating to you ('access right').
2. Rectify/correct Personal Data relating to you ('right to rectification').
3. Object to processing of Personal Data relating to you ('right to object').
4. Restrict the processing of Personal Data relating to you ('right to restriction').
5. Erase/delete Personal Data relating to you (i.e., the "right to erasure")and
6. 'Port' certain Personal Data relating to you from one organisation to another ('right to Personal Data portability').

These rights are not absolute and only apply in certain circumstances. You may exercise any of the above rights by sending an e-mail to privacy@kilmurrylodge.com

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. In Ireland this is the Data Protection Commission. Their website is www.dataprotection.ie

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful.



The exercise of Data Subjects' rights as some other "interactions" requires the univocal identification of the person submitting such request as being, in fact, the Data Subject to whom such Personal Data pertains to. Therefore it may be necessary to set in place mechanisms/processes which confirm such identification has occurred.

Links to Other Sites

Our website may include links to third-party websites, plug-ins and applications, e.g., links to third-party sites with which we work to provide certain services. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy statements. When you leave our website or apps, we encourage you to read the privacy notice of every website plug-in and/or application which you visit.

Changes to this Notice

We reserve the right to change this Notice from time to time in our sole discretion. If we make any changes, they will be posted here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree.

Contact Us

Questions, comments, requests and complaints regarding this Notice or your Personal Data held by us are welcome and should be addressed to us at Privacy Lead at privacy@kilmurrylodge.com

All requests will be dealt with promptly and efficiently.

This Notice is effective from 01/07/2024

Schedule 1

Please see our cookie notice to see some of the third parties with whom we share your Personal Data.