

GUEST PRIVACY NOTICE

INTRODUCTION

Dakota Hotels are operated by Dakota Hospitality Limited (“DHL”, “we”, “us”, or “our”). We are committed to protecting your privacy and handling your personal information responsibly and transparently.

This privacy notice explains how we collect, use, share, and protect your personal data. We are required to do so under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We want you to feel confident that your information is safe with us. While data protection law can be complex, our promise to you is straightforward:

- We will never sell your personal data.
- We will only share your data with trusted third-party providers where necessary to deliver our services or comply with the law.
- We will keep your data secure and confidential.
- You will have clear rights over your data, including the right to access, correct, delete, or restrict its use where legally applicable.
- You can opt out of marketing communications from us at any time.

HOW WE USE YOUR PERSONAL INFORMATION

We collect and process your personal data to provide and manage our services to you. This may include information you provide directly, or information shared with us by a third party on your behalf. We will only use your data where we have a lawful basis, such as:

1. Contractual necessity – to fulfil a contract we have with you (e.g. hotel bookings or event reservations).
2. Legal obligation – where we are required to process data to comply with the law.
3. Vital interests – in rare cases, to protect your life or someone else’s.
4. Legitimate interests – where the processing is necessary for our business operations or your interests, unless overridden by your data protection rights.
5. Consent – where you have given clear permission for us to use your data for a specific purpose (e.g. subscribing to marketing emails). You can withdraw your consent at any time.

We will not disclose your personal data to any third party unless we have your permission, it is necessary for the purposes outlined above, or we are legally required to do so.

YOUR RIGHTS

Under data protection law, you have the right to:

- Request access to the personal data we hold about you. You can do so via: <https://ico.org.uk/for-the-public/make-a-subject-access-request/>
- Ask for incorrect or incomplete data to be corrected.
- Request deletion or restriction of your data where appropriate.
- Object to processing based on legitimate interests or direct marketing.
- Withdraw consent at any time, where processing is based on your consent.

To exercise your rights or for any questions about how we handle your personal data, please contact us in writing at gdpr@dakotahotels.co.uk.

You can also find further information on your rights from the Information Commissioner's Office (ICO) at <https://ico.org.uk>.

HOW YOUR INFORMATION WILL BE USED

DHL collects and processes your personal data for specific purposes, in accordance with data protection legislation. This includes:

1. To verify your identity – helping us confirm bookings, manage accounts, or respond to enquiries securely.
2. To enhance your experience – allowing us to tailor services, communications, and offers to your preferences.
3. To provide you with relevant information – such as booking confirmations, event updates, or promotional offers (where consented).
4. To reserve, secure, and deliver services – including accommodation, dining, event reservations, and other hospitality services.
5. To take and manage payment – for the goods and services you purchase, and to maintain accurate billing records.

We only collect and process information that is necessary for these purposes and in line with a lawful basis under the UK General Data Protection Regulation (UK GDPR).

YOUR RIGHT TO COMPLAIN

If you have any concerns about how your data is handled by DHL, we encourage you to contact us directly so that we can resolve the matter. However, if you are not satisfied with our response, you have the right to lodge a complaint with the UK's independent data protection authority:

Information Commissioner's Office (ICO)
Website: <https://ico.org.uk>
Telephone: 0303 123 1113

LEGAL OBLIGATIONS: PASSPORT AND IDENTITY INFORMATION

As part of our legal obligations under the Immigration (Hotel Records) Order 1972, we are required to collect and retain specific personal information about our guests.

What We Collect

We are required to collect the following information from all guests aged 16 and over:

- Full name
- Nationality
- Next destination (if known)

In addition, for guests who are not UK or Irish nationals, we are required to collect:

- Passport or identity document number
- Place of issue of the passport or ID
- Details of your next destination

This information may be verified against your identity document upon check-in. While we may view your passport or ID for verification, we will only retain a copy where necessary and lawful to do so.

Why We Collect This Information

The lawful basis for this processing is compliance with a legal obligation under UK immigration law. This requirement supports the UK's border security and public safety framework.

How Long We Keep It

In line with the law, we retain this information for a minimum of 12 months from the date of your arrival. These records must be made available for inspection by law enforcement authorities, such as the police, if requested.

SHARING YOUR INFORMATION

We may share your data with trusted third parties who support the delivery of our services (such as booking platforms, payment processors, or IT providers). This is always done securely and only where necessary for operational or legal reasons.

Please refer to the table below for a breakdown of the types of information we collect and the third parties with whom we may share it for processing purposes. This table is kept under review and may be updated as required.

Business function	Purpose of processing	Categories of individuals	Categories of personal data	Categories of third party recipients
Marketing	Direct marketing	Website Subscribers	Email address, preferences	Processor - marketing website; Cendyn CRM, T93FT, Google, Meta, Sevenrooms, Shiji, Avvio
Marketing	Bedroom bookings and direct marketing	Future, present and past subscribers	Contact details, history and preferences	WhatsApp, Shiji
Marketing	Loyalty program administration	Loyalty app members, Future, Present and Past Guests	Contact details, DOB, History & Preferences	Processor - Nonius, SHR CRM
Marketing	Loyalty program direct marketing	Loyalty App members and database subscribers	Email address	Marketing website, Cendyn CRM
- Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	Contact details - Name, email address and telephone number.	Processor - Shiji, ReviewPro and UpsellGuru
- Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Planet
- Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	History & Preferences	Processor - Shiji
Website Bookings	Online Bedroom Booking	Future, Present and Past Guests	Contact Details	Processor - Allora.ai - AVVIO, SiteMinder, ReviewPro and UpsellGuru
Website Bookings	Online Bedroom Booking	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Allora.ai - AVVIO, Global Payments and SiteMinder
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Global Payments, SiteMinder, Navarino and third party website the guest booked through themselves including but not limited to Booking.com, Trip Advisor, Trip.com and Expedia.
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Contact Details	Processor - SiteMinder, Navarino, ReviewPro, UpsellGuru and third

				party website the guest booked through themselves including but not limited to Booking.com, Trip Advisor, Trip.com and Expedia.
Credit Card Terminal	Credit / Debit Card Payments	All paying customers	Credit / Debit Card Details	Processor - Planet
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, requests and dietary notes	Processor - Sevenrooms
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, Credit / Debit Card Details	Processor – Freedom Pay, Planet
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	History & Preferences	Processor - Sevenrooms
CCTV	Safety and Security	All persons on hotel property	Photographic Image	Police; HMRC; Food Alert (H&S Consultants);
Health and Safety	External advice, Legal Obligation	Future, Present and Past Guests	Contact Details, descriptions of Health & Safety incident including accident or alleged food poisoning.	Health and Safety Executive, Food Alert(H&S Consultants); Hendersons Insurance Brokers and related insurance companies
Gift Vouchers	Voucher Sales and Delivery	Gift Voucher Customers and Recipients	Contact details (Purchaser and Recipient)	SK Chase, Avvio
Revenue/ Marketing	Collecting Guest Feedback	Future, Present and Past Guests	Contact Details	Processor - Review Pro
Vehicle Number plates – Dakota Eurocentral Edinburgh and only	Car park security and authority	All persons on property or entering car park with a vehicle.	Vehicle registration plates	Processor – Parking Eye
Recruitment	Applications to job vacancies	Job applicant	Contact Details, CV	Harri, A2H - Hire Intelligence