



## **Vintry & Mercer's Privacy Notice**

Vintry & Mercer Hotel respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of our privacy policy [here](#). Please also use the Glossary below to understand the meaning of some of the terms used in this privacy notice.

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## **1.0 Important information and who we are**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how The Vintry & Mercer Hotel Limited collects and processes your personal data that you may provide to us whether through the website, directly over email, through a third-party booking agent, over the phone or otherwise before, during or after your visit to our hotel.

### **Controller**

The Vintry & Mercer Limited is a controller of your data and is therefore responsible for your personal data ("Vintry & Mercer" or "we"). We are registered with the Information Commission and our registration number is ZA225480.

**If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us:**

by email: [privacy@vintryandmercerc.com](mailto:privacy@vintryandmercerc.com)



by telephone: +44 20 3908 8105

by post: Vintry & Mercer Hotel, 19 – 20 Garlick Hill, London, EC4V 2AU

Changes to the privacy notice and 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.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. 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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2.0 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

<b>Identity Data</b>	Includes name, business card details
<b>Contact Data</b>	Includes address, email address and telephone numbers
<b>Passport Data</b>	Includes a copy of your passport or international driving licence if you are a non-UK resident
<b>Profile Data</b>	Includes your preferences, likes and dislikes, feedback and survey responses, website password, duration of stay, number of guests (including children) in party, movements from guest keycards, CCTV footage in public areas, tv channel choices
<b>Communications Data</b>	Includes all correspondence and other communications with us in connection with bookings or feedback or otherwise in the course of business, whether by email, on the phone (including voicemail messages), by letter or otherwise
<b>Financial Data</b>	Includes bank account and payment card details
<b>Transaction Data</b>	Includes details about payments to and from you and other details of services that you have received at Vintry & Mercer
<b>Technical Data</b>	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 this website
<b>Usage Data</b>	Includes information about how you use our website and our services
<b>Marketing Data</b>	Includes your preferences in receiving marketing from us

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<b>Sensitive Data</b>	<p>If you choose to give it to us, we may collect data that is considered to be sensitive such as data about your health or particular health requirements, your religious beliefs or other such sensitive data.</p> <p>We do not generally require this information and we only collect it if you choose to give it to us and because you think that it will assist us in making your visit to us more comfortable or more personalised. We only collect this information where you choose to give it to us on the basis of the provision of a particular service you have asked us to provide.</p>
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We also collect, use and share **Aggregated Data** on our website 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 notice.

### **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 book you a room or a dinner reservation). In this case, we may have to cancel the contract we have with you but we will notify you if this is the case at the time.

### **3.0 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, Financial, Profile, Passport, Correspondence and/or Special Categories of Personal Data in person, by filling in registration forms at Vintry & Mercer or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

Book a stay or a meal or a visit or other service with us;

Visit us at Vintry & Mercer in person;

Provide us with special requests in respect of your visit to Vintry & Mercer;

Subscribe to our newsletter;

Request marketing to be sent to you;

Enter a competition, promotion or survey; or

Give us some feedback.



**Automated technologies or interactions on our website.** 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. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [here](#).

Alternatively, you can also download a pdf version of our Cookie Policy [here](#).

**Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

Identity, Contact, Financial, Profile, Correspondence and/or Special Categories of Personal Data from third party booking websites such as:

Expedia

Booking.com

Online/ offline travel agencies (for example Expedia, Bookings.com)

SLH

Mr and Mrs Smith

OpenTable

Afternoon.co.uk

These third-party booking agents provide us with your information as data processors but they may also be data controllers of your data. You should read the privacy policies available on their websites to find out more.

Technical Data from your website use from the following parties:

- (a) analytics providers such as Google based outside the EU;
- (b) advertising networks based [inside **or** outside] the EU;
- (c) search information providers such as Google, based inside **or** outside the EU.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Avvio based inside **or** outside the EU.



#### 4.0 How 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:

Where we need to provide the service under the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

In respect of your Sensitive Data, we will only collect this from you where you provide this information voluntarily because you think that we need to be fully informed of the specific service that you are asking us to provide. Where you do so, we will take this as a clear affirmative action signifying your agreement to the processing of your Sensitive Data. You may withdraw our right to process your Sensitive Data on your behalf at any time.

Generally we do not otherwise rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register your booking or to register you as a guest at Vintry & Mercer	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary to comply with a legal obligation
	(c) Passport	(c) Where you have consented to the specific processing of your Sensitive Data for the provision of a particular service to you
	(d) Sensitive	
	(e) Correspondence	

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<p>To process payments for our services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Communications</p> <p>(f) Passport</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Confirming your stay or booking with us</p> <p>(b) Communicating with you about your requests and preferences</p> <p>(c) Notifying you about changes to our services, our terms or privacy policy</p> <p>(c) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing</p> <p>(e) Communications</p> <p>(f) Sensitive</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how guests and customers use our services)</p> <p>(d) Where you have consented to the specific processing of your Sensitive Data for the provision of a particular service to you</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content to you and measure or understand the effectiveness of the website content</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

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	(e) Marketing	
	(f) Technical	
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Consent through you clicking "agree" on the cookie pop-up notice on our website.
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Consent

## 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 products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or booked a visit to 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 chosen not to opt out of receiving that marketing.

## Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your other arrangements with us.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please click [here](#).

Alternatively, you can also download a pdf version of the cookie policy [here](#).

## 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.

## **5.0 Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

**Our sister company:** Our sister company is the Ampersand Hotel Limited: [www.ampersandhotel.com](http://www.ampersandhotel.com) and may act as joint controller or processor and with whom we share administrative services and other functions.

**External Third Parties: Service providers acting as data controllers who provide services to our guests, where we need to provide your details in order to provide the service you require, such as car booking companies or tour operators.**

**Prospective Third Parties:** 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 notice.

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.

## **6.0 International transfers**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **7.0 Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data 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.

## 8.0 Data retention

How long will you use my personal data for?

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

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.

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

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.

## 9.0 Your legal rights

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](http://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.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

<b>Request access to your personal information</b> (commonly known as a "data subject access request")	This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
<b>Request correction of the personal information that we hold about you</b>	This enables you to have any incomplete or inaccurate information we hold about you corrected.
<b>Request erasure of your personal information</b>	This enables you to ask us to delete or remove personal information 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 information

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	where you have exercised your right to object to processing (see below).
<b>Object to processing of your personal information 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.</b>	You also have the right to object where we are processing your personal information for direct marketing purposes.
<b>Request the restriction of processing of your personal information</b>	This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
<b>Request the transfer of your personal information to another party.</b>	This enables you to seek a transfer of your personal data to a third party elected by you.
<b>Complain to the Information Commissioner's Office (ICO)</b>	If you have a complaint about the way in which we are managing and processing your personal data.

If you wish to exercise any of the rights set out above, please [contact us](#).

## **No fee usually required**

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your 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 your personal data (or to exercise any of your other rights). 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.

## **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.