



## RIVERHOUSE

### Privacy Policy

Bingham Riverhouse is a trading name of the Bingham Riverhouse Hotel and Restaurant Limited. We value your privacy and so we'd like to explain how personal information is collected and used appropriately by us.

- A. Privacy
- B. Website & Cookies
- C. Bingham Riverhouse' social tools
- D. Privacy for Job Applicants

#### A. Privacy

We confirm that any personal information which you provide to us will be held securely and in accordance with the registration that we have with the Information Commissioner's Office. We will use and process your personal information in accordance with the General Data Protection Regulation (GDPR), as amended from time to time, as well as any other relevant data protection or privacy legislation regulations.

Information we collect.	We may collect Personal Information and Device information in connection with your registration, use, booking or enquiry on or about Bingham Riverhouse Riverhouse, directly or through our third parties.
How do we collect it.	<ol style="list-style-type: none"><li>1. When you register or use the Bingham Riverhouse.co.uk (the "Website").</li><li>2. When you register or use our in-house WIFI (Blackbx).</li><li>3. When you book an overnight stay with us directly, through our booking agent Avvio, HOP or any of our online travel agents ("OTA's") such as Mr &amp; Mrs Smith, Epoque Hotels, Booking.com, Expedia, the list of which changes regularly.</li><li>4. When you make a restaurant reservation through Bookatable or Opentable.</li><li>5. When you purchase a Bingham Riverhouse Gift Voucher through Bingham Riverhouse Riverhouse' gift portal owned and operated by Gift Bonobo.</li><li>6. When you contact Bingham Riverhouse Riverhouse by telephone or email or in person.</li><li>7. When you leave a customer feedback card</li></ol>

	<p>after visiting us for a stay, dinner or event.</p> <ol style="list-style-type: none"> <li>8. When you book a Bingham Riverhouse Riverhouse event through Eventbrite.</li> <li>9. When completing any forms for transactional, employment or other purposes.</li> <li>10. CCTV footage is recorded in Bingham Riverhouse's public spaces for security purposes. It is possible that you could feature in these recordings.</li> <li>11. When you apply for a job (see section D Privacy for Job Applicants).</li> </ol>
<p>How we use your Personal Information?</p>	<p>Primarily your information is used for the purpose of facilitating your stay or visit and for providing services which you have requested including, but not limited to: making reservations or bookings; sharing your details with our sister eco wellbeing centre, bhuti in order that they can provide treatments and classes as requested by you; tailoring our services to your requirements and preferences; paying for services; purchasing gift vouchers; responding to or following up on your comments, enquiries and questions; providing guest care; providing customer service; complying with our policies, procedures and legal obligations as required or permitted by applicable law; protect, investigate against fraudulent, unauthorised or illegal activity.</p> <p>We also use your information to: operate and improve our website; personalise your experience on our site including relevant display advertising and performing statistical analysis.</p> <p>With your consent, retain your personal information, preferences and details of your transactions in order to keep you informed by email, post, mobile messaging, telephone and/or through other digital means including social media platforms, about products and services (including special offers, discounts, promotions, events, competitions and so on) offered by Bingham Riverhouse.</p>
<p>What do we collect.</p>	<p>In addition to personal details such as your name, date of birth, postal address, email, telephone number and for certain services payment information, Bingham Riverhouse may also collect some of the following personal information about you:</p> <ol style="list-style-type: none"> <li>1. Details of bookings and reservations</li> </ol>

	<p>you've made.</p> <ol style="list-style-type: none"> <li>2. Details of your dietary requirements (where applicable) and preferences, such as your favourite bedroom and your food likes and dislikes.</li> <li>3. Details of your visits to the Website, in-store WIFI and the resources that you access.</li> <li>4. Details of when you contact Bingham Riverhouse by email, post or telephone.</li> <li>5. Any other information from which we can identify you (or which is available on the internet).</li> <li>6. When you visit our website, certain information is automatically collected from devices. We also collect information about your usage, activity, certain technologies such as cookies and generic location information.</li> </ol>
Who do we share information with.	<p>We do not sell or share data with third parties other than:</p> <p>We may share your information with Bingham Riverhouse's sister company, bhuti, an eco-wellbeing escape in order to facilitate use of their facilities and organise treatments requested by you.</p> <p>We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or security to protect your information from unauthorised access or processing.</p>
In future	We may tailor emails and online advertising based on what you've shown an interest or preference in.
Website	Bingham Riverhouse's website from time to time may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and Bingham Riverhouse does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal details to these websites.
Data retention.	We will not keep your personal information processed by us for any purpose or purposes for longer than is necessary for that purpose or for those purposes. We normally retain information for a period of 6 years. However,

	<p>each division within Bingham Riverhouse has different retention periods for client information. Please email <a href="mailto:be@binghamriverhouse.com">be@binghamriverhouse.com</a> and request further information if you require.</p>
<p>What you agree to</p>	<p>You agree that you do not object to us using your personal information for any of the purposes outlined in this privacy policy and you confirm that you do not and will not consider any of these purposes as a breach of any of your rights.</p> <p>Europe and UK residents. In accordance with applicable data protection law, you are entitled to know what personal information we hold about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. Under applicable law, you may also have the right to request deletion or blocking of your personal information or to object to the processing of your personal information. If you wish to exercise your rights, please contact us on 020 8940 0902 [1] or by email to <a href="mailto:be@binghamriverhouse.com">be@binghamriverhouse.com</a>.</p> <p>You have the right to object to the processing of your personal information for purposes of advertising as well as marketing and you have the right to revoke a consent given by you at any time with effect for the future.</p> <p>Please check back on our website frequently to see any updates or changes to our privacy policy.</p> <p>For any questions regarding this policy, please contact us Bingham Riverhouse, 61-63 Petersham Road, Richmond, TW10 6UT, by telephone on 0202 8940 0902 [1] or by email at <a href="mailto:be@binghamriverhouse.com">be@binghamriverhouse.com</a>.</p>

## B. Cookies

In general, our site uses cookies to keep track of your visits to the site. A Cookie is a small file that can be stored by your browser on your computer's hard drive. Our site, developed by Avvio and Internet Dreams, uses cookies for the following reasons:-

- For functionality pertinent to the HOP booking engine for bedrooms.
- Session cookies which link a browsing customer with a server session
- To collect information and report website statistics without personally identifying individual users.
- To measure the overall time to load entire webpages.
- To understand information about use of websites and whether you're registered or logged in

- To select appropriate advertising or relevant content.

You can usually change your browser's settings so that it will not accept cookies, although this may restrict some website functionality.

### **C. Bingham Riverhouse's 'social' tools**

We know you love to share the great content we have at Bingham Riverhouse. Please be aware that social networking sites, like Facebook, Twitter and Instagram might send cookies. We don't control the setting of these third-party cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

### **D Privacy for Job Applicants**

Bingham Riverhouse is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we collect and hold on you as a job applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

#### **1. Data controller details**

The Company is a data controller, meaning that it determines the processes to be used when using your personal data.

#### **Data protection principles**

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

#### **Types of data we process**

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- marital status
- whether or not you have a disability
- information included on your CV including references, education history and employment history
- documentation relating to your right to work in the UK
- driving licence

### **How we collect your data**

We collect data about you in a variety of ways including the information you would normally include in a CV or a job application cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references.

Personal data is kept in personnel files in a locked cabinet or within the Company's HR and IT systems.

### **Why we process your data**

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons.

Generally, we will rely on the first three reasons set out above to process your data.

We need to collect your data to ensure we are complying with legal requirements such as:

- carrying out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled employees.

We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:

- making decisions about who to offer employment to
- making decisions about salary and other benefits
- assessing training needs
- dealing with legal claims made against us

If you are unsuccessful in obtaining employment, your data will not be used for any reason other than in the ways explaining in relation to the specific application you have made.

We may seek your consent to retaining your data in case other suitable job vacancies arise in the Company for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

## **2. Special categories of data**

Special categories of data are data relating to your:

- health

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- to determine reasonable adjustments

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law.

## **3. Criminal conviction data**

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment should you be successful in obtaining employment. We use criminal conviction data in the following ways:

- for recruitment purposes
- to protect the reputation of the business
- to assess if criminal convictions pose a risk to the business and how best to manage it
- We rely on the lawful basis of legitimate business interests to process this data.

## **4. If you do not provide your data to us**

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application.

## **5. Sharing your data**

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, the HR department (Head Office), those in the department where the vacancy is who responsible for screening your application and interviewing you, the IT department where you require access to our systems to undertake any assessments requiring IT equipment.

In some cases, we will collect data about you from third parties, such as employment agencies and previous employers for the purpose of getting references.

Your data will be shared with third parties if you are successful in your job application. In these circumstances, we will share your data in order to process payroll, process pension, in certain cases process the private health care and take advice on HR matters.

We do not share your data with bodies outside of the European Economic Area.

## **6. Protecting your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

## **7. How long we keep your data for**

In line with data protection principles, we only keep your data for as long as we need it for and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for 4 months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 6 months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdraw your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent, but no earlier than 4 months from when the recruitment exercise ends.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

## **8. Automated decision making**

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human

involvement) which has a significant impact on you.

## **9. Your rights in relation to your data**

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact the General Manager.

## **10. Making a complaint**

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.