



Privacy policy

Rectory Manor

February 2022

Rectory Manor is operated as a “sole trader” by Mr Frank R Lawrenson whose registered address is Rectory Manor, Rectory Road, Great Waldingfield, Sudbury, Suffolk CO10 0TL. (“we”). For the purposes of the General Data Protection Regulation (GDPR) 2016 we are the Data Controller and are responsible for ensuring we preserve and protect your privacy under data protection legislation. This policy outlines how we collect and process your personal data and is our Privacy Notice for the purposes of GDPR.

Privacy Policy

Rectory Manor understands the importance of privacy and as such takes your right to privacy very seriously. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

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1 Important information and who we are

1.1 We are the Data Controller and are responsible for ensuring we preserve and protect your privacy under data protection legislation. This policy outlines how we collect and process your personal data.

1.2 We do not have a data protection officer (DPO), but if you have any questions about this privacy notice, please do contact us using the details set out below.

1.3 Our full details are:

Full name of legal entity: Rectory Manor

Person who correspondence should be addressed to in respect of data protection: Frank Lawrenson, Proprietor

Email address: frank@rectorymanorhotel.co.uk

Postal address: Rectory Manor, Rectory Road, Great Waldingfield, Sudbury, Suffolk CO10 0TL

2 The information we collect

2.1 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).

2.2 We may collect, use, store and transfer the following personal information from you as a result of the following activities: -

2.2.1 By making a reservation and using any of our services. When making a reservation or using services provided by Rectory Manor it is necessary to obtain information in order to identify you, contact you and process your purchase and request.

2.2.2 By corresponding with us by phone, email and social media sites (including but not limited to, Facebook, Twitter, Instagram) or otherwise. The information you give us may include your name, email address, postcode, postal address, telephone number, date of birth, credit card information. We may keep a record of that correspondence.

2.2.3 By submitting details on a comment card or feedback form. This may include your name, email address, telephone number and details of your experience.

2.2.4 By registering for our loyalty scheme. If you have signed up to be part of our loyalty scheme you have also consented to supply personal information in accordance with the Terms & Conditions of the scheme.

2.2.5 By registering for any Memberships. If you have signed up to become a Member you have also consented to supply personal information in accordance with the Terms & Conditions of the Membership.

2.2.6 By participating in a competition or other marketing initiatives. This may include your name, email address, postcode and telephone number.

2.2.7 By choosing to complete a survey. If you choose to complete a survey the information collected will be relevant to the research being conducted. This may include information such as your name, email address, date of birth, gender, interests, postcode.

2.2.8 Technical information regarding your visit to our websites including, but not limited to, the Internet protocol (IP) address used to connect your computer to the internet, login data, browser plug-in type and version, operating system and platform, time zone setting and location and other technology on the devices you use to access our websites; and

2.2.9 Website performance, using Google Analytics, provided by Google Inc. Google uses Cookies to collect information on your visit to our website and how you use it including the full Uniform Resource Locators (URL), length of visits to certain pages, page interaction, date, time as well as page response times, mobile compatibility.

2.3 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 data about your usage of our websites 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.

2.4 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.5 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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

2.6 Our websites 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 websites, we encourage you to read the privacy notice of every website you visit.

2.7 Our websites are not intended for children.

3 Cookies

3.1 Our websites use cookies:

3.1.2 for technical purposes, to ensure our websites are functioning properly and across multiple devices and operating systems;

3.1.3 to enable us to collect statistical information about browsing habits, page interaction and preferences so we can constantly improve our website and service;

3.1.4 to define types of customers for our products and services;

3.1.5 to develop an informed marketing strategy and grow our business.

3.2 We only use cookies for our site statistics package, which allows us to collect information about how visitors use our websites. We use the information to compile reports to help us improve our websites. The cookies collect information in an anonymous form, including the number of visitors to our websites, where visitors have come to the site from and the pages they visited. We collect this information in a way which does not identify anyone.

3.3 If you would like your computer to decline these cookies, you can do this by disabling all cookies in your internet browser settings - please refer to your browser's "help" menu for instructions. Please note that if you choose to decline the use of cookies you may be unable to access certain parts of our websites.

For further information on Cookies please visit www.aboutcookies.org

4 How we use your personal data

4.1 We will only use your personal data when the law allows us to. As set out in paragraph 4.6, find out more about the types of lawful basis that we will rely on to process your personal data.

4.2 We may use the information we collect and hold about you in the following ways:

4.2.1 to facilitate an enquiry to provide you with the information you request from us prior to the completion of a purchase or other form of contract;

4.2.2 to answer enquiries and provide requested information;

4.2.3 information provided to us in the form of comment cards / guest feedback forms will be used to follow up with you; and shared with hotel staff and wider management to ensure we continually improve our services and products and to recognize individual employee's good work;

4.2.4 to enable us to fulfil any contractual obligations between you and us;

4.2.5 to notify you about changes to our services or inform you of circumstances that may impact on our ability to deliver those services or your experience;

4.2.6 manager and administer our business;

4.2.7 review and improve our products and services;

4.2.8 administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

4.2.9 to ensure that content on our websites are effective for both you and your chosen device;

4.2.10 to provide you with marketing information in accordance with your marketing preferences as set out in paragraph 4.3

4.3 We will add your details to our marketing database if:

4.3.1 you make an enquiry about our products or services;

4.3.2 you buy our products or services; we will consider you a 'live customer' if you have stayed with us in the past 36 months

4.4 We may send you marketing communications by email, telephone, automated calls, text message or post. You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls) or you may ask us not to send you any marketing communications at all.

4.5 We never share your personal data with third parties for marketing purposes.

4.6 The types of lawful basis that we will rely on for processing your personal data are as follows:

4.6.1 Legitimate Interest which means conducting and managing our business in our interests, or the interests of a third party. Our interests could include, for example, our internal administrative purposes, ensuring network and information security or for promoting our business including direct marketing. 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 or the interests of a third party. 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 as set out in paragraph 1.3.

4.6.2 Performance of Contract which means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

4.6.3 Comply with a legal or regulatory obligation which means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

4.7 Generally we do not rely on consent as a legal basis for processing your personal data other than [in relation to sending third party 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 as set out in paragraph 1.3.

5 Disclosure of your personal data to others

5.1 We may share your personal data with:

5.2 We may also share your personal information with selected third parties who are:

5.2.1 service providers acting as processors based in the UK who provide IT and system administration services, website development services, website maintenance services, server and hosting services fraud prevention and credit risk reduction services;

5.2.2 professional advisors acting as processors or joint controllers including lawyers, bankers, auditors/accountants and insurers based in the UK who provide consultancy, banking, legal insurance and accounting services;

5.2.3 HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK;

5.3 We may also share your personal data with 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 or enter into a joint venture. 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.

6 Data security

6.1 All the information you provide to us will be stored securely and we use strict procedures and security features to try to prevent unauthorised use, disclosure or accidental loss. 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. CSS Cloud Ltd act as our data processor and have a contractual obligation to provide network security on our behalf.

6.2 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.

7 International transfers

7.1 Except as required by Google for the use of Google Analytics we do not transfer your personal information outside the European Economic Area (EEA). Google is obligated to protect your personal information as a member of the Privacy shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

8 How long will we keep your personal data

8.1 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.

8.2 In some circumstances you can ask us to delete your data: see Request erasure in paragraph 9.1.3

8.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request contacting us as set out in paragraph 1.3.

9 Your rights in connection with personal data

9.1 You have the right to:

9.1.1 Request access to your personal data: Also known as a “data subject access request”. This enables you to receive a copy of the personal data held about you and to check that we are lawfully processing it.

9.1.2 Request correction of the personal data that we hold about you: If you believe the information we hold to be incorrect or incomplete you can request an amendment by contacting us, though we may need to verify the accuracy of the new data you provide to us.

9.1.3 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

9.1.4 Object to processing of your personal data: You can object to us processing 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

9.1.5 Request restriction of processing of your personal data: This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9.1.6 Request the transfer of your personal data: The transfer can be to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

9.1.7 Withdraw consent at any time where we are relying on consent to process your personal data: However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

9.2 If you wish to exercise any of the above rights, please contact us as set out in paragraph 1.3

9.3 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.

9.4 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.

9.5 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.

10 Changes to our privacy policy

10.1 This version was last updated on the date stated at the beginning of this privacy policy.

10.2 We reserve the right to update this privacy policy at any time, a copy of which will be available on our websites. Please check back frequently to see any updates or changes to our privacy policy. Where appropriate we may also contact you by email with regards to any changes to this policy.

10.3 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.

10.4 Special Privacy Rules that apply to guests staying at Rectory Manor

Reviews, photography/video & Privacy

- Photography of the property is only permitted for private purposes. Photographs/videos of people (including staff, family, other guests, friends etc) is not permitted under any circumstances.
- Guests may review the business online. However, in doing so, guests waive their right to anonymity. As is the case with OTA's like AirBnB, we reserve the right to review guests in return, through whatever public forum we deem appropriate including social media. We reserve the right to use their name and approximate location i.e. Chelsea or SW3.
- Rectory Manor operates a video security system in public areas. This information is kept securely and automatically deleted within 30 days. However, we reserve the right to use

non-identifying video/photography to illustrate any behaviour that we deem to be below acceptable standards, through whatever public forum we deem appropriate including social media.

- In the case of damages, threatening behaviour or illegal activity, we reserve the right to pass any video/photography on to the police, to use it in court ourselves and through whatever public forum we deem appropriate including social media.
- These specific terms in clause 10.4, taken from our “terms and conditions” override anything else in the privacy policy if there is a conflict.

11 Complaints

11.1 You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) should you be unhappy with the way in which we collected or processed your personal data. Further information can be found on the ICO website www.ico.org.uk or via their helpline on 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us as set out in paragraph 1.3 in the first instance.