

## Privacy Policy 2019

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We are committed to the privacy and confidentiality of your information. This Privacy Policy describes our current policies and practices about our use of personal information.

Please take your time to read this Privacy Policy carefully. When using the Wittenberg website, this Policy should be read alongside the Website Terms and Conditions.

1. About us
2. Our processing of your personal information
  - Where you or your employer books a serviced apartment through SACO and/or Wittenberg
  - Where you use our website
3. What marketing activities do we carry out?
4. Automated Decision-Making
5. How long do we keep your personal information for?
6. What is our approach to sending information overseas?
7. How do we protect your information?
8. Our Cookie Policy
9. Your rights
10. Contacting us
11. Updates to this Policy

### **1. About us**

This is the Privacy Policy of SACO The Serviced Apartment Company Limited, which trades as SACO ("SACO") on behalf, and as a partner brand of, Wittenberg. We are a company registered in England and Wales under registration number 07638220 of 6th Floor, Embassy House, Queen's Avenue, Bristol, BS8 1SB.

SACO is one of the UK's leading providers of serviced apartments with an extensive network of properties in cities around the world. Our business was born because our founder loved the benefits of apartment living for business and leisure travel, as well as the value, choice and flexibility that simply isn't available in traditional hotels.

As a serviced apartment provider, we collect and process data so that we can manage your booking, deal with your booking enquiries, improve your experience when using our website and where relevant, deal with any issues that you may have. This makes us a "controller" of your personal data.

We also use third party apartment providers ("Partners") who supply serviced apartment services to our customers where an apartment is required in areas where SACO does not currently operate or

does not have availability. Where you book one of our Partner's serviced apartments, we will use your personal information to book the apartment for you and provide your personal data to the relevant Partner to allow them to prepare the apartment for your arrival and to contact you if there are any issues. For this activity, our Partners are also "controllers" and this Privacy policy covers their processing of your personal data.

Any processing of your personal information by our Partners that is outside the scope of the above will be carried out in accordance with that Partner's Privacy Policy.

## **2. Our processing of your personal information**

We will collect and use different personal information about you for different reasons, depending on our relationship with you.

Sometimes we will receive "special categories of personal information" (which is information relating to your health, racial or ethnic origin, religious or philosophical beliefs) where you provide this to us as part of a special request in connection with your stay. Where you provide us with your special category personal information we will use this to provide you with advice and to help you find a serviced apartment that is suitable to your needs.

Where you provide personal information to us about other individuals (for example, members of your family or other guests staying in the apartment) we will also be controller of their personal information and we are responsible for protecting their personal information and using it appropriately. This Policy will therefore apply to those individuals and you should refer them to this Policy.

To make this Policy as user friendly as possible, we have split it into different sections. Please click on the section below that best describes your relationship with us and the service you receive from us.

### **Where you or your employer books a serviced apartment**

This section applies if you or your employer book an apartment at Wittenberg.

### **What personal information will we collect?**

#### **At booking stage**

- Your full name and title, address, telephone numbers and email addresses, date of birth and gender.
- Identity documents such as passport, driving licence and national insurance number.
- Employment status and related information such as job title.
- Details of your special requests which are relevant to your booking.
- Details of your previous stays or bookings with SACO and/or Wittenberg.
- Vehicle registration number.
- The number of adults and children that will be staying in the apartment with you.

- Details of the payment card that you use to make the booking, including the type of card, expiry date and last four digits.
- Your smoking preferences.
- Recordings of telephone calls we make when you book over the telephone.

## **On arrival at your serviced apartment**

- Identity documents such as passport, driving licence and national insurance number.
- Details of your next destination if you provide this to us.
- Your full name and title.
- Your unique booking reference number.
- CCTV recordings of your arrival at the apartment.

## **During or following your stay**

- Any feedback that you provide to us, including any complaints that you may have.

## **What special category information will we collect?**

- Information about your health if relevant to your booking (for example whether you have a physical disability that would require you to have wheelchair access to an apartment).
- We will also collect information that you provide to us through a special request as part of your booking where you deem it relevant, for example which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs, political views or data concerning your sex life or sexual orientation

## **How will we collect your personal information?**

Directly from you:

- When you book one of our apartments through our website or over email
- When you book one of our apartments over the telephone;
- During any subsequent communications we have with you, such as by telephone, email or live chat or when you make a general enquiry.

We will also collect your personal information from:

- Your employer, if the booking is made by your employer on your behalf.

## **What will we use your personal information for?**

We use your information for the following legal reasons:

- We need to use your personal information to enter into the booking contract with you. We will rely on this legal reason for all activities that are connected to your booking and without using your personal information we would be unable to do, such as confirming your booking details following confirmation of payment.
- We have a business need to use your personal information. This will include for the purpose of operating and improving our website, ensuring the security of our website and services, maintaining back-ups of our databases, and responding to your enquires. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.
- When we use your "special category information" (such as information about your health), we will ask for your explicit consent. We are also permitted to use your special category information if we need to establish or defend our legal rights.

## **What is the purpose for using your personal information?**

- To manage your booking and booking preferences and to provide you with access to the apartment you have booked.
- To communicate with you in respect of your booking and to answer any queries that you may have.
- To provide improved quality, training and security (for example, through recorded phone calls to our contact numbers, or carrying out customer satisfaction surveys).
- To obtain or maintain insurance cover, manage risks or obtain legal advice.

## **Legal grounds for using your personal information**

- It is necessary to enter into or perform your contract.
- We have a business need (to run our business effectively and provide a high-quality service)
- It is necessary to enter into or perform your booking contract.
- We have a business need (to respond to all communications)
- For business purposes such as operating and improving our website, ensuring the security of our website and services, and maintaining back-ups of our databases
- We have a business need (to develop and improve the services we offer)
- We have a business need (to ensure we are adequately insured and have an effective risk strategy in place)

## **Legal grounds for using your special category information**

- Your consent.

- We need to establish, exercise or defend legal rights.
- We have a business need (to run an efficient business)
- We need to establish, exercise or defend legal rights.

## **Who will we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Other companies in the SACO Group, which comprise SACO Property Group, The Serviced Apartment Company Limited, Locke Hotels, The Wittenberg and The Moorgate.
- Service providers we have contracted with including payment service providers, our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers and business suppliers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- Law enforcement agencies such as the police, HMRC and taxation authorities.

## **Where you use our website**

This section applies if you use or access the Wittenberg website.

## **What personal information will we collect?**

- Name, address, email address and telephone number where you submit this information to us.
- IP address and your geographical location.

## **How will we collect your personal information?**

We collect your information:

- Directly from our website and where you have submitted any information on our website.
- Through our use of cookies. You can find more information about this within our cookies policy in section 8 of our policy below.
- Through the use of Google Analytics.

## **What will we use your personal information for?**

We use your information for the following legal reasons:

- **We have a business need to use your personal information**, this will include identifying trends on our website, popular pages and areas that we can make it easier to use for customers in order to improve its performance. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

## **What is the purpose for using your personal information?**

- To identify trends on our website, popular pages and areas that we can make it easier to use for customers to improve its performance.

## **Legal grounds for using your personal information**

- We have a business need (to review and enhance the performance of our website).

## **Who will we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Other companies in the SACO Group, which comprise SACO Property Group, The Serviced Apartment Company Limited, Locke Hotels, The Wittenberg and The Moorgate.
- Service providers SACO have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers, marketing mailing providers and business suppliers.

## **3. What marketing activities do we carry out?**

- When you subscribe to our email notifications and/or newsletters we will send you the relevant notifications and/or newsletters – but only if you've agreed. You can unsubscribe from this type of communication at any time by clicking the link in the footer of the email or emailing us on [email@sacoapartments.com](mailto:email@sacoapartments.com). We also collect additional information in connection with your participation in any competitions that we run.
- We also use Facebook and LinkedIn marketing services in order to promote our serviced apartments on Facebook and LinkedIn.
- We do not sell your information to third parties.

## **4. Automated Decision-Making**

Automated decision making refers to a situation where a decision is taken using personal information that is processed solely by automatic means (i.e. using an algorithm or other computer software) rather than a decision that is made with some form of human involvement.

SACO does not currently undertake automated decision making.

## 5. How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations. We set out below examples of the retention periods that we apply:

- Where you book an apartment through one of our Partners, the personal information that we collect from you and from the relevant Partner will be retained for 7 years.
- Where you submit an enquiry through our website but do not proceed to book a SACO or a Partner apartment, we will retain your personal information for 12 months.

If you would like further information about how long we will keep your personal information for, please contact us using the details set out in section 9.

## 6. What is our approach to sending your personal information overseas

We will transfer your personal information outside of the European Economic Area ("EEA") when we transfer information to our Partners located outside of the EEA where you have enquired about that Partner's apartment or are looking to book that Partner's apartment.

We are also entitled under European data protection laws to transfer your personal information to countries outside the EEA in the following circumstances:

- It is necessary for the performance of the contract we have with you.
- It is necessary to protect your vital interests i.e. it is a life or death situation.

There may also be some instances where your personal information is transferred to countries outside the EEA such as when we transfer information to third party suppliers who are based outside the EEA or when third parties who act on our behalf transfer your personal information to countries outside the EEA.

Where such a transfer takes place, we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected. We will do so in a number of ways including:

- Entering into data transfer contracts and using specific contractual provisions that has been approved by European data protection authorities otherwise known as the "standard contractual clauses";
- Transferring personal data to companies in the United States who are certified under the "Privacy Shield". The Privacy Shield is a scheme whereby companies certify that they provide an adequate level of data protection;
- We will only transfer personal data to companies in non-EEA countries who have been deemed by European data protection authorities to have adequate levels of data protection for the protection of personal information.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 9.

## **7. How do we protect your information?**

SACO ensure that all our systems are protected using secure passwords and multi-factor authentication mechanisms. All customer data is held within secure data centres using industry standard protection and encrypted where applicable. All data access is segmented by role and user rights.

## **8. Our Cookie Policy**

Whenever you visit a website, your computer may store a small string of information which is commonly known as a cookie - your browser will then provide this back to the website every time you return in order to improve your experience. We use these cookies to help identify and track our valuable visitors, by understanding your usage of the website, website access preferences and they enable us to recommend content we feel would be most relevant to you. Don't worry, most cookies will not collect information that identifies you personally but instead they may store more general information such as how you visit and navigate our website.

### **What type of cookies do we use?**

- Status Cookies

We use cookies when you are logged in to prevent you from having to log in every time you visit a new page, and to support with property search. Typically these cookies are cleared when you log out to ensure that you can only access restricted features and areas when logged in.

- Authentication/Security Cookies

We use cookies to check the authenticity of information supplied in a form and to help the website guarantee that all details, whenever they are submitted throughout the site, are genuine and haven't been modified to contain any malicious links.

- Personalisation Cookies

We use different types of cookies to run our website and ads-related products. Third-party cookies are derived from other websites' advertisements to track your web use for marketing purposes.

- Orders Processing Related Cookies

We offer e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

- Site Preferences Cookies

We provide the functionality to set your preferences for how this site runs when you use it in order to provide you with a great experience. Cookies are therefore set to remember your preferences, so that they can be recalled whenever you interact with a page affected by your preferences.

- Targeting Cookies

We use targeting cookies in order to build a profile of your interests and show you relevant content, delivering specially tailored targeted advertising where appropriate.



- Analysis Cookies

We use analysis cookies through third party analytic websites to help understand how our visitors engage with our properties. These cookies collect information and report website usage statistics to help us continuously improve user experience.

## Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through our site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official [Google Analytics help centre](#).

- We work with a number of third party agencies who also use analytics to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.

If you do not wish to have cookies placed on your computer, you can disable them by amending the settings within your browser but please keep in mind this could come with the drawback that certain features of the website may not function properly without this aid.

## 9. Your rights

You have several data protection rights which entitle you to request information about your personal information, to dictate what we do with it or to stop us using it in certain ways.

If you wish to exercise the rights set out below, please contact us at any time using the details set out in section 9. There will not normally be a charge for this.

We respect your rights in relation to personal information we hold about you, however we cannot always comply with your requests, for example:

- We may not be able to delete your information if we are required by law to keep it for a longer period of time; or
- If we delete your information we would not have the necessary information we need to complete your booking or manage your SACO account.

## **The right to access your personal information**

You can request a copy of the personal information we hold about you and certain details of how we use it.

Your personal information will normally be provided to you in writing unless you request otherwise or where you have made a request by electronic means such as email, we will provide such information in electronic form where possible.

## **The right to withdraw your consent**

Where we rely on consent as the legal ground to use your personal information, you are entitled to withdraw that original consent.

## **The right to rectification**

We make reasonable efforts to keep your personal information where necessary up to date, complete and accurate. We encourage you to ensure that your personal information is accurate so please regularly let us know if you believe that the information we hold about you may be inaccurate or not complete. We will correct and amend any such personal information and notify any third party recipients of necessary changes.

## **The right to restriction of processing**

Subject to the circumstances in which you exercise this right, you can request that we stop using your personal information, such as where you believe that we no longer need to use your personal information.

## **The right to data portability**

Subject to the circumstances in which you exercise this right, you can request that we port across personal information you have provided to us to a third party in a commonly used and machine-readable format.

## **The right to erasure**

You can request that we delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdrawn consent.

Whilst we will assess every request, this request is subject to legal and regulatory requirements that we are required to comply with.

## **The right to object to direct marketing**

You can request that we stop sending you marketing messages at any time by clicking on the "unsubscribe" button in any emails that we send to you or by contacting us using the details set out in section 9.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

You can download our data request forms (Subject Access Request and Right To Erasure forms) [here](#). Please download the forms, complete them and either upload the form on the page, or send it to us along with a copy of your valid photo ID to [marketing@sacoapartments.com](mailto:marketing@sacoapartments.com).

## **The right to make a complaint with the ICO**

Where you believe that we have breached data protection laws when using your personal information, you can complain to the Information Commissioner's Office (ICO). For more information visit the ICO's website at <https://ico.org.uk/>. Please note that exercising this right and lodging a complaint will not affect any other legal rights or remedies that you have.

## **10. Contacting us**

If you would like further information about the ways we use your personal information, further clarity on how we use your personal information or anything referred to in this Policy, please contact our Group Financial Officer at [DCarre-Bishop@sacoapartments.com](mailto:DCarre-Bishop@sacoapartments.com) or by writing to Daniel Carre-Bishop, Group Financial Officer, SACO The Serviced Apartment Company Limited, 6th Floor, Embassy House, Queen's Avenue, Bristol, BS8 1SB.

## **11. Updates to this Privacy Policy**

We are continually improving our methods of communication and alongside with changes in the law and the changing nature of technology, our data practices and how we use your data will change from time to time. If and when our data practices change, we will notify you and we will provide you with the most up-to-date Policy. You can view it by checking our website [here](#).

This Policy was last updated on 30th September 2019.