

Our Commitment to You

The Doyle Collection (“we” or “us”) is committed to protecting and respecting the privacy of every individual who visits our properties and/or uses any of our websites. For this reason, we want to provide you with clear and transparent information about how we collect, use, and protect your personal data, the circumstances where we share your personal data and your rights in relation to your personal data.

This Privacy Notice (“the “Notice”) set out the basis on which any personal data we collect from you or that you provide to us, or that is provided to us relating to you (“Data”) by any means will be processed. It has been updated to comply with the requirements of the General Data Protection Regulation (EC) 2016/679 and UK General Data Protection Regulation (UK GDPR) (“GDPR”).

This includes when you, or someone on your behalf, requests information from us, contact us (or we contact you), make a booking, use our websites, link to or from our websites, connect with us via social media, through our central reservations or hotels, or any other engagement we have with you (regardless of where you are based).

By visiting our websites, you are accepting the practices described herein. We may update this policy from time to time, so please check this policy periodically for changes.

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1. Data Controller

This Privacy Notice is issued on behalf of each company within The Doyle Collection, so when we refer to The Doyle Collection, we, or us in this Notice, we are referring to the relevant company in The Doyle Collection responsible for processing your personal data. Doyle Hotels (Holdings) Limited is the controller of and responsible for The Doyle Collection website.

2. Collection and use of personal data

We collect personal data from you which you volunteer when you provide such personal data to us, or via our services with which you interact.

We also may be given other personal data relating to you by other persons.

These include but are not limited to:

1. if a booking is made for you by another person,
2. who may be a family member or travelling companion,
3. or a booking agent or other intermediary,
4. working for you or,
5. where you are travelling on business,
6. your employer, or other third-party books on your behalf.

Depending on how you interact with us or what type of service you are using we will process your personal data for the purposes and legal basis outlined below.

We will only use your personal data when we have a lawful basis to do so. We obtain and use your personal data that we hold where it is necessary:

1. to take steps at your request prior to entering into a contract with you and to carry out our obligations arising from any contracts entered into between you and us including providing you with the services listed below;
2. for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
3. to comply with our obligations under applicable legislation;
4. for reasons of substantial public interest, such as the prevention or detection of crime, or other unlawful acts, subject to appropriate protections as set out in our internal policies and procedures; and/or
5. to establish, exercise or defend legal claims.

Please 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 personal data.

When we refer to our legitimate interests, we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product, understanding your requirements and preferences, and the best and most secure experience. 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 activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).

Generally, we do not rely on consent as a legal basis for obtaining and processing your personal data other than in relation to:

1. sending direct marketing communications to you; and/or
2. information about your health, any disabilities, and allergens that you or someone on your behalf volunteers to us to enable us to accommodate your needs during your stay.

Where we are using your personal data on the basis of your consent, you can withdraw that consent at any time (subject to applicable law) by contacting us at data_protection@doylecollection.com.

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.

Direct Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Where you have agreed to receive it, we may use your personal 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 services and offers may be relevant for you.

We will not share your personal data with any company outside The Doyle Collection for non-Doyle Collection marketing purposes without your express consent.

We may use your personal data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your personal data in this way, please notify us to that effect. 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 using the [contact details](#) set out at the end of this notice.

Legal basis for Processing your Personal Data

Purpose	Types of Personal Data	Legal Basis
<p>For us to fulfil our role in providing:</p> <ul style="list-style-type: none">• Bedroom accommodation,• Food & beverage services,• Meeting rooms,• Events• Guest Recognition Program• Other hospitality related services to you.	<ul style="list-style-type: none">• full name;• address;• various email addresses;• various phone numbers including mobile phone numbers;• financial information about you including your bank account details;• nationality;• credit card details or other payment details;• details of contracts you have entered with third parties for us to provide services to you;• details of your relationship to other parties;	<p>Performance of a contract</p> <p>We need to process this data to provide you with an effective service and to enter a contract with you/legal obligation.</p>

	<ul style="list-style-type: none"> • details of your membership of professional or other organisations; • date of birth; • details of your children and other guests; • medical details including details of allergies; • guest preferences including likes and dislikes, • your photograph obtained from public sources used in limited circumstances* • details of your car registration number; • details of your driving license; • details of your passport, <i>for security reasons we will process a copy of your identification.</i> <p>(*the limited circumstances noted are that of our Guest Recognition Program)</p>	
<p>Processing of Sensitive Data</p> <p>We do not collect data which is particularly sensitive unless it is volunteered by you. We use certain sensitive or special category data to better serve and meet your needs. This special category or sensitive data may be processed in the event of an accident, a medical or other emergency or your use of our other facilities during your stay.</p>	<p>Examples of sensitive personal data we collect and process include:</p> <ul style="list-style-type: none"> • food allergies; • dietary requirements which may imply or suggest your religion, health or other sensitive personal data; • mobility requirements; • disabilities; and • medical conditions 	<ul style="list-style-type: none"> • Consent <p>To better serve and meet your needs and ensure and efficient service is provided to you.</p>

<p>Direct Marketing</p> <p>With your consent will we use your name and contact details to send you direct marketing communications from The Doyle Collection about our products and services and those of our group entities.</p>	<ul style="list-style-type: none"> • Name • Email 	<ul style="list-style-type: none"> • Consent <p>You can opt of marketing communications at any time.</p>
<p>CCTV</p> <p>We use CCTV surveillance for the legitimate purpose ensure the safety and security of our staff, guests, and property. Footage may also be used to support the management of operational activities.</p>	<ul style="list-style-type: none"> • Visual data • Locational data • Vehicle data 	<ul style="list-style-type: none"> • Legitimate Interest
<p>Online Shop</p> <p>To be able to process your purchase order and handle payment transactions. To be able to manage your deliveries, claims, warranty matters, returns and refunds in a secure and effective manner and to be able to notify you of the details and the status of such matters</p>	<ul style="list-style-type: none"> • Name • Address • Email address • Phone number • Credit card details 	<ul style="list-style-type: none"> • Performance of a contract <p>We need to process this data to provide you with an effective service and to enter a contract with you/legal obligation.</p>
<p>Business Intelligence</p> <p>In some situations, we will process de-identified data. Data is in this state when we are not able to link data to an individual to whom such data may relate</p>	<ul style="list-style-type: none"> • Date of booking • Location 	<ul style="list-style-type: none"> • Legitimate Interest.

without taking additional steps. In those instances, and unless allowed under applicable law, we will maintain such information in a de-identified state, and will not try to re-identify the individual to whom the de-identified data relates		
Business Analysis We will use some of your personal data to assess and understand general trends and patterns relating to our business.	<ul style="list-style-type: none"> • Name • Date and time of visit • Purchasing patterns 	<ul style="list-style-type: none"> • Legitimate interest in business analysis and development.

3. How We Protect and Store Your Personal Data

To protect your information, on Doylecollection.com we use security measures that comply with Irish Law and meet international standards. This includes computer safeguards and secure files and buildings. We will take all reasonable care to keep the details of your booking or reservation and credit card information secure.

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We do continue to revise policies and implement additional security features as new technologies become available.

4. Data Transfers

Though we do not seek to actively transfer personal data outside the EEA/UK, some of the external third parties we deal with are based outside the EEA/UK or process personal data outside the EEA/UK, so their processing of your personal data will involve a transfer of data outside the EEA/UK.

Whenever we transfer your personal data out of the EEA/UK, we look to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and UK Parliament.

- Where we use certain service providers, we may use specific contracts approved by the European Commission and UK Parliament which give personal data the same protection it has in Europe and the UK.
- Where we use providers based in third-countries, we may transfer data using a valid transfer mechanism, such as entering into standard contractual clauses (SCC) which includes the international data transfer addendum required for the UK, which requires them to provide similar protection to personal data shared between Europe/UK and these third-countries.

Please note that when booking a room in one of our hotels located outside the EEA/UK your personal data will be transferred to this location in order to allow us to fulfil our contract with you and to provide you with services.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the EEA/UK

5. How Long Do We Keep Your Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, 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.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for current year plus six years after the transaction in question. We also need to keep information for that period to be able to deal with any dispute.

6. Sharing Your Personal Data

We do not sell your personal data. We will only pass your personal data to our business partners, to fulfil your requirements, improve our services or where we are required to do so by law. The Doyle Collection use third parties to better meet your needs and provide an efficient and effective service in our hotels and online.

Where these third parties are our processors, we require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party processors 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.

Some of the third parties mentioned above, for example many professional advisers and relevant statutory body in your jurisdiction, are controllers who, like us, are subject to specific obligations under data protection law, and who will have their own privacy notices setting out how they deal with personal data.

Please note that gyms and leisure facilities and car parking at a number of our hotels are operated by independent companies. These operators are controllers in their own right and have their own obligations under data protection laws.

Purpose	Categories of Personal Data	Recipients
To offer personalised products and services tailored to you, consistent with the purposes identified in this Privacy Policy	All categories of personal data	To all other members of The Doyle Collection, and/or our affiliated companies, that require use of this data
We use and employ third parties to carry out our tasks and functions on our behalf. These include, administration, marketing, payment processing, web hosting, reservation management, auditing, legal, insurance and information technological systems and customer relational management.	All categories of personal data provided to us that is relevant for the function provided.	Third party service providers
Sale of business or assets	All categories of personal data provided to us that are relevant.	Perspective buyer or seller

7. Links to Other Sites

Our website contains links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

8. CCTV

For the greater security of our guests and patrons, and to prevent and detect crime, we use CCTV in and around our premises. To obtain information about our use of CCTV contact us at data_protection@doylecollection.com or please see our CCTV policy [here](#).

9. Use of Artificial Intelligence

We use artificial intelligence (AI) technologies within our business to enhance services, improve customer support, and streamline operations. While AI may assist in processing information to deliver faster and more accurate responses, we do not use personal data to train AI models. All AI tools are configured to protect user privacy, and personal data is handled in accordance with our data protection practices and applicable privacy laws.

10. Your Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- **Right to Access** - to request confirmation of whether we process personal data relating to you, and if so, to request a copy of that personal data;

- **Right to Erasure** -In certain circumstances you may request that we erase your personal data that we hold;
- **Right to Rectification:** You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
- **Right to Portability:** You may request us to provide you with certain Personal Data which you have given us in a structured, commonly used, and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.
- **Right to Object:** You may object to us processing your personal data on the basis of our legitimate interests (or those of a third party)
- **Right to Restriction:** You have the right to ask us to halt the processing of your personal data in certain circumstances.
- **Right to Complain:** You have the right to lodge a complaint regarding the processing of your Personal Data.

Please use the contact details in the ["How to contact us?"](#) section below to exercise your rights.

11. Changes to this Policy

We reserve the right to change this privacy policy on occasion, in whole or part, at our sole discretion. Any changes will be effective immediately. You should check this page from time to time to take notice of any changes we make, as they will be binding on you.

12. Cookie Usage

For specific information on how we use cookies on our website please see our [Cookie Policy](#).

Our marketing emails may contain cookies or similar technology to enable us to understand how you have interacted with our content including whether and when you opened our email and whether you have visited our website as a result. Please see our [Cookie Policy](#) for more details.

13. US State Data Privacy

Specific laws apply to the personal information of Californian residents. Additional US states have passed laws extending similar privacy rights to their consumers. Please see our [US State Data Privacy Policy](#) for more information.

14. How to Contact Us

If you have any questions or comments about this Privacy Policy, the use of cookies, if you would like us to update personal data we have about you or your preferences, or to exercise your rights, please email us data_protection@doylecollection.com.

In the unlikely event that you wish to lodge a complaint about our handling of your data or request you can complain to The Data Protection Commissioner in Ireland, The Information Commissioners Office in the United Kingdom or to the Supervisory Authority in your country of residence.

Appendix 1

Doyle Hotels (Holdings) Limited and other group undertakings are the controllers of and responsible for processing your personal data and comprises of the following entities

Doyle Hotels (Holdings) Limited, Temple Chambers, 3 Burlington Road, Dublin 4, D04 RD68, Ireland, trading as The Doyle Collection

West Hotel Trading Company Limited Balfe Street, Dublin D02 CH66, Ireland, trading as The Westbury

Doyle London Hotels Limited, 47 Welbeck Street, London, W1G 8DN, United Kingdom, trading as The Marylebone

Doyle Bloomsbury Hotel Limited, 16-22 Great Russell Street, London WC1B 3NN, United Kingdom, trading as The Bloomsbury

Doyle Kensington Hotel Limited, 109-113 Queen's Gate, South Kensington, London, SW7 5LP, United Kingdom, trading as The Kensington

Doyle Hotels (UK) Limited, Prince Street, Bristol BS1 4QF, United Kingdom trading as The Bristol

P.V. Doyle Hotels Limited, Western Road, Cork, T12 X2AH, Ireland, trading as The River Lee

P.V. Doyle Hotels Limited, Jones' Road, Dublin 3, D03 E5Y8, Ireland, trading as The Croke Park

Doyle Dupont LLC, 1500 New Hampshire Avenue NW, Washington DC, 20036, United States, trading as The Dupont Circle