

Personal data policy for handling guest, customer, and supplier information

The purpose of Schæffergården's personal data policy is to explain how we gather, protect, and utilize personal data. We fully respect all wishes regarding the secrecy of personal data and we are aware of the necessity to take appropriate precautions regarding protection and secure handling of all personal that we receive. Schæffergården aims to protect your personal data regardless of the source of this information, how the passed along our stored.

1. Data Controller

Schæffergården is the data controller.

Schæffergården's contact information

is:

Schæffergården
Jægersborg Alle
166
2820 Gentofte
Att.: Lisa Juul Kibsgaard

Schæffergården processes all personal data in accordance with current privacy laws.

Schæffergården form agreements with guests, customers and suppliers regarding delivery – purchase and sale – of various services and products.

When a guest/customer/supplier orders and purchases one or more of Schæffergården's service, and as part of this submits personal data to Schæffergården, the guest/customer/supplier simultaneously consents to letting Schæffergården handle their personal data.

The same applies to potential personal data that suppliers to Schæffergården might submit to Schæffergården while in the process of presenting an offer or the signing of an agreement with Schæffergården.

2. The collection of personal data by Schæffergården

Personal data is collected by Schæffergården through the following means:

- When a guest/customer – or a representative for them – chooses to collect offers for and/or purchase one of Schæffergården's services/products, or when a supplier submits an offer or sells products or services to Schæffergården.
- From B2B market.
- Through browser cookies and web beacons.
- In connection with use of Schæffergården's digital services.
- Through participating in Best Westerns loyalty program and through subscription to the Schæffergården newsletter.
- From social media, advertising and analytics providers, as well as public registries.
- By means of video and television surveillance.
- When suppliers sign an agreement with Schæffergården or submits offers to Schæffergården.

Collecting and handling of personal data cf. the above-mentioned will always occur in accordance with current privacy laws.

Schæffergården's properties have been equipped with video surveillance to prevent crime and further functions as a reassuring initiative to employees and guests. Storage and removal of video recordings occur in accordance with current privacy laws.

3. Information that Schæffergården collects

Schæffergården collects the following personal data:

- Name, address, telephone number, email address, birth date, as well as other ordinary, non-sensitive personal data.
- Debit card information – typically as a guarantee for a reservation and as payment for a stay.
- Demographical information.
- Purchase history, including the use of digital services.
- The use of Best Western's customer/loyalty program.
- Information from Schæffergården's customer surveys.
- Information from any offered contests.
- Information from Schæffergården's social media and other digital platforms appertaining Schæffergården.

- Browser information.
- Information regarding the guest's/customer's company and relevant contacts.
- Information regarding suppliers' business, as well as information about relevant contacts and key people, including key accounts.

A guest can, voluntarily and of their own decision give Schæffergården further personal data, which they believe, could be of influence on Schæffergården's service of the guest/customer/supplier, or that the person in question believes should be given as a security consideration.

This can for instance be information regarding:

- Handicap
- Allergy
- Specific food preferences
- Other health or treatment-related information

If a guest voluntarily and of their own decision choose to submit such information, it will be perceived by Schæffergården as consent to register and store this sensitive information regarding the person in question.

In addition to the information Schæffergården receive directly from guests/customers/suppliers, Schæffergården will in some instances obtain or process additional information, which Schæffergården has received from a third party, e.g. a travel agency, another mediator or an employee of the company the registered is employed.

In such a situation, the third party in question is obligated to inform the guest/customer/supplier in question of Schæffergården's terms and conditions, as well as Schæffergården's personal data policy. It is also the third party in question's responsibility to secure that the required legal basis for collecting and handling the data is present, including obtaining the consent necessary for processing potential sensitive information.

4. Payment by payment card

Schæffergården utilizes DIBS <http://www.dibs.dk/> (Nets) to process payments with payment and credit cards. DIBS and Schæffergården are approved and certified by the Bank Payment System (www.pbs.dk).

For orders and bookings, Schæffergården saves card information that the guest/customer/suppliers have submitted for up to five months, after which the data is deleted.

Besides the purpose of managing orders, the information required is solely used in the event a guest/customer/supplier, as an example, contacts us with questions or there are issues with the order.

5. What is the purpose of collecting and processing data?

Schæffergården only collects personal data that is relevant to fulfill the agreements made with customers regarding delivery of a service, e.g. an overnight stay.

It is the nature of the individual service that decides which personal data Schæffergården collects and processes, and which decides the purpose of the collection.

The purpose with collecting and processing personal data will primarily be:

- Processing of guest reservations and purchases of Schæffergården services.
- Processing of suppliers' offers regarding purchase – and sale – of products and services.
- Contact to the guest prior to, during and after their stay.
- Fulfilling the guest's requests regarding offers on or purchases of services.
- Preparation and development of Schæffergården services.
- Adaptation of Schæffergården marketing other communication.
- Analysis of customer behavior and marketing targeting towards these.
- Adjusting partner communication and marketing towards our guests.
- Administration of our guests' relations to Schæffergården.
- Performance of legal requirements.

6. Authority – the legal basis – for processing data

Schæffergården can, as an example, process the personal data of guests because it is necessary to fulfill a contract. It could be in relation to e.g. hotel stays, holding meetings or hosting social gatherings.

Furthermore, Schæffergården will process personal data in relation to bookings prior to an overnight stay, meetings being held, social gatherings, conferences, etc. as well as prior to accepting supplier agreements.

In some instances, the processing of personal data by Schæffergården will be a step for Schæffergården in the pursuance of a legitimate/objective-oriented interest, which comes before the registrant's interests.

Such a legitimate interest could for instance be the preparation of statistics, customer surveys, marketing, and analysis of general guest/customer behavior, which has the purpose of improving the experience at Schæffergården and the quality of Schæffergården's services and products.

If a guest in relation to their stay/visit at Schæffergården states particular personal preferences or considerations including health-related information, handicap, religious view or the like, Schæffergården solely utilizes this information to accommodate the service in question to the guest's specifications.

In some situations, Schæffergården will receive personal data from a third party, e.g. A travel agency, an agent or similar, for instance in connection with group bookings. When this happens, the third party in question is obligated to inform the guest in question about Schæffergården's terms and conditions, as well as the content of this personal data policy.

According to law, confer the above under section 5, Schæffergården is further required to register various information regarding guests staying overnight. These data must be stored for at least one year, two years at most.

7. The registrant's rights.

According to the laws stated in the EU's General Data Protection Regulation, the registrant has various rights.

- A registrant is always entitled to be informed of which personal data Schæffergården handles about the registrant.
- A registrant is always entitled to the ability to correct and update the personal data that Schæffergården possesses about the registrant.
- A registrant is always entitled to the ability to remove the personal data that Schæffergården possesses about the registrant. If a registrant requests removal, all the information, that Schæffergården is not required by law to store, is removed. A removal of the registrant's data can in some instances mean that Schæffergården cannot fulfill potential concluded agreements or deliver certain services to the registrant.

If some of the information, which Schæffergården possesses regarding the registrant, is given on the basis of the registrant's consent, the registrant in question is always entitled to the ability to revoke the consent, which entails that the data is removed or is no longer utilized by Schæffergården. This does not apply to information. cf. the above, which Schæffergården is legally required to store.

The ability to request removal, etc. can, however, be limited out of consideration of the private life of other individuals, trade secrets and intellectual property rights, as wells as for the sake of e.g. enforce potential legal claims.

The registrant can at any time write to Schæffergården and request an overview of the personal data that Schæffergården possesses about the registrant.

A written request in this regard has to be signed by the registered and contain their name, address, telephone number, and email address.

The registrant can also contact Schæffergården if they believe their personal data are being processed contrary to the legislation or contrary to other responsibility, such as the agreement/contract that the registrant has with Schæffergården.

Written requests are sent to Schæffergården, contact information can be found in section 1.

Schæffergården will, as far as possible, send the information requested by the registrant in their written application to the registrant's mailing address.

If the registrant requests the correction of and/or removal of their personal data, Schæffergården will assess whether the conditions for the request are fulfilled, in which case Schæffergården will conduct the changes or removal as quickly as possible.

Schæffergården reserves the right to decline a request that are recurring and harassing in nature or requires disproportionate technical precautionary measures (e.g. the development of a new IT-system) or which affects the protection of personal data from other registered, or in other situations where it would be disproportionately resource demanding or complicated to accommodate for the request.

8. Security and sharing of personal data

Schæffergården protects the registrant's personal data and has established guidelines that protect the registrant's personal data against unauthorized publication and against unauthorized accessed or knowledge of the data.

Only the people/employees of Schæffergården that due to their job function require access to the registrant's personal data, have access.

Schæffergården continuously checks that no unauthorized access has been made to the registrants' personal data.

Schæffergården continuously performs a backup of the registered personal data.

In the event of a security breach, where the registrants' personal data were at high risk of abuse, e.g. Including theft of identity, economical loss, loss of reputation or other types of abuse, Schæffergården will notify the registrants about the security breach as quickly as possible.

Schæffergården's security procedures are continuously being reviewed and updated with regards to the technological development.

Schæffergården utilized a range of external suppliers of IT services, IT systems, payment solutions, etc.

Schæffergården conducts ongoing data processor agreements with all Schæffergården suppliers, by which it is secured that external data processors maintain a level of protection sufficient to and of high enough quality with regards to the registrants' personal data.

Schæffergården is in some instances legally required to pass along personal data or otherwise required as part of a settlement from a public authority.

Schæffergården removes your personal data when the legal obligations for Schæffergården expire, or when the purpose with collecting and processing the data no longer is present.

9. If you apply for a position at Schæffergården

When you apply for a position at Schæffergården, the information you have submitted to Schæffergården are processed with regards to your application.

Typically, this concerns general personal data such as name, address, telephone number and email address, information about educational background, as well as information about current and previous occupation.

If you are employed by Schæffergården, your information will be saved in accordance with Schæffergården's personal data policy for employees.

As a general rule, applications by candidates that are not employed are stored for six months from the rejection.

Schæffergården can in certain instances pass along your personal data if required according to the law, a court trial or current legislation.

Schæffergården protects your personal data in accordance with the in article 7 stated precautionary measures in current personal data policy.

10. Cookies

Schæffergården utilizes cookies. Further information regarding the cookie policy of Schæffergården can be obtained here:

<http://www.schaeffergaarden.dk/>

11. Complaints

Complaints about Schæffergården's handling of personal data can be made to the Data Protection Agency, BORGERGADE 28, 5. 1300 KØBENHAVN K, TELEFON 3319 3200 - email dt@datatilsynet.dk