

Commercial Services Privacy Notice

Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when controlling and processing your personal data.

This notice applies to data held by the College's Commercial Services department about conference organisers and delegates; individuals who pay to book or attend events; visitors and non-student guests staying in Royal Holloway's accommodation.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:

- **'personal data'** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

For the purpose of this document, the following terms are defined as:

Conference or Event Organiser – the lead contact/s responsible for organising an event, wedding, function, group booking or conference hiring Royal Holloway's facilities and services

Conference Delegate or Event Attendee – an individual paying Royal Holloway directly to attend an event directly or indirectly via a host organisation. This may also include delegates funded by a Conference Organiser, for example, as a keynote speaker.

Guest – anyone who stays in Royal Holloway's accommodation, making their booking via a process other than the accommodation application processes used by Royal Holloway's students.

Commercial Services keeps in touch with Conference and Event Organisers providing benefits and services to them and developing other potential business opportunities.

What personal data will be collected

The data the College collects includes:

- Personal information
- Contact details including email address, business or home address, phone number
- IP address

- Vehicle registration number
- Nationality
- Passport/ Identity card number
- Payment card information

Special category data processed may include:

- Age
- Sex
- Disability Pregnancy and maternity
- Religious or other similar beliefs
- Physical or mental health details

Personal data provided by you about others

You may provide us with personal data about other individuals, for example, guests sharing a double- or family-occupancy bedroom, names of guests attending a wedding-party, or next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to the College and in what capacity (i.e. as your listed next of kin/emergency contact).

How and when do we collect your personal data?

Personal information is collected from you during the booking or registration process. This could be via accommodation booking or conference registration services available online. Alternatively, bookings may be made over the phone, via email or in person.

Organisers of residential events are asked to provide Royal Holloway with a rooming list prior to arrival. This is in spreadsheet format, including guests name and in some cases, title, gender as well as a group identification, for example an organisation, employer, school, College or University, team, or similar. This is used to allocate accommodation and prepare room keys in advance of the event to ensure the check-in process for your accommodation is as smooth and efficient as possible.

Personal data from third parties

Your Conference and Event Organiser may provide us with relevant information they have collected from you in relation to the Event you are attending. If you have registered to attend a conference or event via a third party, please note that the Conference Organiser will have their own privacy policies and we do not accept any responsibility or liability for these policies. This may, for example, include your contact details appearing on the delegate list given to conference delegates, sponsors and exhibitors during registration, or being added to a mailing list for the marketing of future conferences.

Why do we collect this data, how do we use it and what is our legal basis for doing so?

For contractual purposes:

- to enable us to supply you with the goods, services and information which you have requested;
- to comply with UK regulations applying to overnight guest accommodation
- to notify you about changes to our service.

For administration purposes:

- to analyse the information we collect so that we can administer, support and improve and develop our services and systems;
- to ensure that content from our systems is presented to you in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;

In addition, to comply with the Immigration (Hotel Records) Order 1972 we need to collect the following information from guests on their arrival:

- full name
- nationality

For all who are not British, Irish or Commonwealth guests:

- passport number and place of issue (or other document which shows their identity and nationality)
- details of their next destination (including the address, if known) on or before departure.

Note: diplomats, their family and staff do not have to register.

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

We may contact you by post, telephone as well as by e-mail and SMS for contractual purposes, for example to confirm receipt of your booking or to change it. Where you have consented, we may continue to provide you with information about our products or services. You can change your preferences at any time. For details on how to do this, refer to the 'You and your data' section below.

How long the College will retain your personal data

The College must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the College has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the College's continued retention of the personal data
- the purposes for which the College may process your personal data
- whether the College is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

CCTV and automatic number plate recognition (ANPR)

The College has a comprehensive, image-only CCTV surveillance system across its campus. Cameras located on and within buildings are monitored by Security. On occasions, Security staff will wear Body Worn Cameras in the course of their duties. These cameras record both images and sound, and data captured in this manner is processed in compliance with GDPR.

College uses ANPR (Automatic Number Plate Recognition) camera technology to manage, control and enforce parking on its sites. They are governed under guidelines from the Information Commissioner's Office on the use of CCTV and ANPR Cameras and are operated by College's Security team. In exceptional circumstances this information may be used as evidence in disciplinary cases.

Sharing your personal data with third parties

Where the College uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Please note that in certain circumstances we may need to share your personal information with a regulator or to otherwise comply with the law.

International Data Transfers

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

On occasion it may be necessary for the College to transfer your personal data outside of the European Economic Area (EEA). This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our web site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Royal Holloway processes credit/debit card details for online bookings; these are only handled by our PCI accredited Merchant Service providers (WPM Education and Worldpay). We do not store your credit or debit card details at all, following the completion of your transaction. All card details and validation codes are securely destroyed once payment has been processed.

Any payment transactions will be encrypted. Some areas of Royal Holloway's website use third-party software facilities such as WPM Education and Worldpay. Please note that, data storage on WPM and Worldpay systems, and the communication with worldwide banking networks, is regularly audited by banking authorities to ensure a secure transaction environment. They also ensure that they stay up-to-date with the latest versions of any third-party code used, and continually review their own proprietary code.

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

You and your data

You have a number of rights in relation to the processing of your personal data by the College:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the College processes your personal data; for example, to confirm its accuracy or the College's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the College's processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.

- **Portability:** You have the right to receive or [request that the College transfers](#) a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) in relation to how the College processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

You can change your preferences at any time by [emailing us](#) at sales-office@royalholloway.ac.uk or writing to us at Commercial Services, Royal Holloway, University of London, Egham, Surrey TW20 0EX.

Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at dataprotection@royalholloway.ac.uk.

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – www.ico.org.uk