

This is the Privacy Statement of The Talbot Collection (“TTC”). In this statement we use the terms “we,” “our” and “us” to refer to TTC.

The purpose of this Privacy Statement is to outline our position concerning the collection, use, retention, disclosure, and transfer of Personal Data which is gathered and processed by us. This Privacy Statement also sets out our information management practices.

TTC respects your right to privacy and is committed to protecting your personal data. This Privacy Statement will inform you as to how we look after your personal data and tell you about your rights and how the law protects you.

It is important that you read this Privacy Statement together with any other privacy statements or fair processing notice’s we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we use your data. This Privacy Statement supplements other notices and is not intended to override them.

## **1. What is Personal Data?**

Personal Data is any information relating to a living individual that allows for the identification of that individual. Personal Data can include a name, address, contact details, an identification number, IP address, CCTV footage, accesses cards/ fobs, audio-visual or audio recordings of a person, details about an individual's location or any other detail(s) specific to that individual such in certain cases special category data such as (Biometric).

## **2. Who we are and how to contact us?**

TTC is made up of different legal entities, as follows; Talbot Hotel Wexford, Oriel House Hotel, Talbot Hotel Carlow, Talbot Hotel Clonmel, Talbot Suites at Stonebridge, Midleton Park Hotel, Newbay House Hotel and Talbot Hotel Stillorgan. This privacy statement is issued on behalf of TTC so where we mention “TTC”, “us”, “we” or “our” in this privacy statement, we are referring to the relevant company in TTC responsible for processing your data.

We have appointed a centralised point of contact for the Collection called a Designated Privacy Representative [“DPR”] who is responsible for overseeing questions in relation to this privacy statement and for all data protection related matters. If you have any questions about this privacy statement, including any request to exercise your legal right please contact us using the details set out below;

Designated Privacy Representative, Talbot Hotel Limited, The Quay, Wexford or by emailing us at [datarequest@talbotcollection.ie](mailto:datarequest@talbotcollection.ie)

## **3. Changes to this Privacy Statement and your duty to inform us of changes**

We keep our privacy statement under regular review. It is important that the personal data that we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **4. Third Party Links**

This website may include links to third party websites, plugins, and applications, such as Facebook, Instagram, Twitter, LinkedIn, YouTube etc. 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 website, we encourage you to read the privacy statement of every website you visit.

## **5. Categories of personal data and how we use it.**

This section of the Privacy Statement sets out the type of Personal Data collected by TTC, the purposes for which such Personal Data is collected and processed and the lawful justifications for such processing in the context of the TTC Websites.

We collect, use, and share aggregate data such as statistical or demographic data. Aggregate data is information gathered and expressed in a summary form for purposes such as statistical or demographic analysis. Aggregate data may be derived from your personal data but is not data that directly or indirectly reveals your identity. For example, we may aggregate your usage data of our websites to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregate 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 data protection statement.

It is not our intention to 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, genetic and biometric data. Nor do we collect any information about criminal convictions and offences. However, during your experience at our Hotels we may need to collect information about your health when you attend our Wellness Centre, or Gym. Additionally, we may need to process special category data if you have any specific dietary requirements or require adaptation to a service due to a disability. If it is necessary to collect such special categories of personal information we will only do so with your explicit consent or where we have another lawful basis to do so and we will explain the purpose for which the information will be used at the point when we collect, it.

## **6. The data we collect about you.**

Personal data, means any information about an individual from which that person can be identified. It does not include data where the identify has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we will group together as follows;

- Identity data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, social media profile;
- Contact data includes billing address, delivery address, email address, telephone number;
- Financial data includes bank account and payment card details;
- Transactional data includes details about payments to and from you and other details of products and services you have purchased from us;
- Technical data includes IP addresses, your login data, time zone and location, browser and plugin type or versions, device type, operating systems and platforms and other technology devices which you use to access our websites;
- Profile data includes purchases or orders made by you, your interest, social media preferences, feedback, and survey responses;
- Usage data includes information about how you use our website, products and services and our social media sites;
- Marketing communications data includes your preferences in receiving marketing from us and other third parties and your communication preferences.
- Special Category Data may include health data such as details about specific dietary requirements, allergies, or information about a disability. We will process this data with your explicit consent and in certain instances with your vital interests in mind. This is so we can ensure that we provide you with a comfortable and safe environment that meets your specific needs.

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

We use different methods to collect data from and about you including through:

### **Direct interactions**

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by email or otherwise. This includes personal data you provide when you:

- request our services; (booking a reservation or attending one of our Hotels or Wellness Centers/Gyms)
- subscribe to our newsletters;
- request marketing to be sent to you;
- provide feedback; or complete a survey
- apply for a job within the Collection;
- entering competitions;

- attendance at conferences or events;
- cctv imagery;
- manage your personal data preference

### **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. All cookies apart from strictly necessary cookies will require your consent.

### **Third parties or publicly available sources**

We may receive personal data about you from various third parties such as;

- you may use various travel booking platforms such as Booking.com, HotelRez, HRS, TripAdvisor, Hotelbeds, Travel Republic, Expedia etc. to book your stay. The aforementioned is a selection of some of these booking platforms, however if you have any queries regarding the source from where we obtained your personal data, please contact us on the following [datarequest@talbotcollection.ie](mailto:datarequest@talbotcollection.ie)
- advertising networks which we utilise and to which you might engage with
- interactions with Social Media sites

## **8. What Personal Data does TTC collect and use online?**

We collect various types of Personal Data when a person uses our website or social media platforms. The following are examples of Personal Data collected by TTC:

- i. Our website uses cookies, web beacons, device identifiers, social plugins, tracking pixels, etc. “Cookies” are small pieces of information stored by your internet browser that collect data such as your browser type, your operating system, web pages visited, time of visits, content viewed, advertisements viewed, and other click stream data. We use cookies to help us tailor our websites to your needs, to deliver a better, more personalized service and to remember certain choices you have made so you do not have to re-enter them. Cookies also enable us to identify traffic to our website including pages visited, visitor numbers and traffic paths taken. We may record which users opened and clicked any embedded links in communications sent by TTC to measure a campaigns effectiveness. We do not deploy un-necessary cookies, such as analytics, marketing, targeting, or profiling cookies without your consent. Please see our Cookie Policy for further details (insert cookie policy link)
- ii. We may collect your personal data from Contact Forms, such as booking a room in our hotel or using one of the many services provided (Wellness Center, Gym, Restaurant or Conference and Event Services; this enables us to deal with your request in a timely manner.
- iii. Competitions: When a person enters a competition, we may collect and use the entrant’s name and contact details (including postal address, email address, telephone number) in connection with the competition (including mobile competitions). Where we operate competitions in conjunction with a third-party commercial partner, subject to the competition rules and notices, that partner may collect and use the data.
- iv. Social Media Pages: Content such as messages and photographs, which are posted on social media pages on which TTC has a presence may be made publicly available and may be used in connection with the operation and promotion of our social media pages, services, and this website. Data such as the name of your internet service provider, the website you visited us from, the parts of our site that you have visited, the date and duration of your visit, and information from the device (e.g., device type, operating system, screen resolution, language, country location, and web browser type) used during your visit. We may process this usage data to facilitate access to our website (e.g., to adjust our website to the devices that are used)
- v. Online Advertising: We may use advertising networks to help present advertisements or other content on our

website and on other websites or social media platforms that display TTC advertisements. By using TTC online services, we may use information gathered from you, and information gathered from third parties, to provide our users with certain tailored advertising offerings through our website, social media sites and other services. TTC gathers web viewing personal data from users across its various services, with their consent and which may then be used by TTC and its service providers to deliver advertising to groups of users based on the preferences or interests inferred from the data collected and processed by TTC (or a third-party service provider's) technology. For example, TTC will only use cookies, web beacons, social plugins, tracking pixels and similar technologies to collect information from a mobile or other device with the consent of the user.

## **9. The purpose and legal basis for processing your information.**

We will only use your personal data where the law allows us to. Most commonly we will use data in the following situations;

- a) *To enter into and perform a contract with you.*  
We may process your information in order to enter into a contract with you or to provide you with a service which you have requested from us. For example, we need to process your personal information in order to enable you to book a room in our hotel or to provide you with a brochure or information about a product or service where you have requested it.
- b) *To comply with our legal obligations*  
We are required to process your personal information to comply with certain legal and regulatory obligations to which we are subject. For example, we are required to obtain certain business records in accordance with company and revenue law which may include your personal information.
- c) *For our legitimate business interests*  
We may use your personal information for the purposes of carrying out activities that are in our legitimate interests (or those of a third party). Where we process your information for our legitimate interests, we ensure that there is a fair balance between our legitimate interest and your fundamental rights and freedoms.

If you are a customer of one of TTC Hotels, Wellness Centre, or Gym, we may use your information to send you communications on special offers and hospitality events that may interest you and that you would reasonably expect to receive, you can at any stage easily opt out of these communications by contacting us on the details provided below or by using the un-subscribe option in the marketing communication.

For further information on the various scenarios of how we use data under Legitimate Interest please see the below table.

- d) *With your consent*  
We will request your consent for the use of all cookies on our websites outside of strictly necessary. You can withdraw this consent at any time by clicking "cookie settings" on our websites, please see this websites cookie policy for further information or click on the link of any of our hotel websites that you may visit

Generally, we do not rely on consent as a legal basis for processing of personal data although we will request consent before sending you third party direct marketing communications, passing on your personal information to a third party for marketing purposes or before sending digital marketing to you if you are not an existing customer. You can revoke your consent at any time by contacting us on the details provided below by using the un-subscribe option in the marketing communication.

- e) *To protect your vital interests*  
We will in certain circumstances use your personal information to protect your vital interests.

We have set out below, in table format a description of all the ways we plan to use your personal data, and which legal basis we rely on to do so. We have also identified our legitimate interest where appropriate.

Note that we may process your personal data on lawful ground depending on specific purpose for which we are using your data:

Purpose	Description	Lawful Basis for Processing
<b>Reserve a Room</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for booking parking.) Financial Data: Bank Card Details</p> <p>Technical Data: I.P, GEO location, Strictly Necessary Cookies (Anti-Fraud/Security)</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party.</p> <p>Where we may engage with you afterwards for direct marketing purposes or through the provision of a survey</p> <p>Necessary to comply with a legal obligation</p>
<b>Guest Check In</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for booking parking.) Financial Data: Bank Card Details</p> <p>Special Category Data: Health Data</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party.</p> <p>The processing is in our legitimate interests where we may need to recover debts due to us. Where we may engage with you afterwards for direct marketing purposes or through the provision of a survey</p> <p>Legal Obligation, where we are required by law to keep a register of guests</p> <p>Explicit Consent of the Data Subject and Vital Interests of the Data Subject: Where applicable you may provide us with details of special requirement you may have, such as any dietary requirements or where you may require adaptation to our service to meet any disability or where additional assistance is required in the event of an emergency or evacuation</p>
<b>Booking and event or meeting space</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for booking parking.) Financial Data: Bank Card Details</p> <p>Technical Data: I.P, GEO location, Strictly Necessary Cookies (Anti-Fraud/Security)</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party</p> <p>The processing is in our legitimate interests</p> <p>Necessary to comply with a legal obligation</p>
<b>To enquire, to reserve and to eat in our restaurants</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for booking parking.) Financial Data: Bank Card Details</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party</p> <p>The processing is in our legitimate interests where we may engage with you afterwards for direct marketing purposes or through the provision of a survey</p>

	<p>Technical Data: I.P, GEO location, Strictly Necessary Cookies (Anti-Fraud/Security)</p> <p>Special Category Data: Health Data</p>	<p>Necessary to comply with a legal obligation</p> <p>Explicit Consent of the Data and Vital Interests of the Data Subject. Where applicable you may provide us with details of special requirement you may have, such as any dietary requirements</p>
<b>To enquire about and to use our Wellness Center, Gym, or recreational facilities</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for booking parking.) Financial Data: Bank Card Details</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party.</p> <p>The processing is in our legitimate interests where we may engage with you afterwards for direct marketing purposes or through the provision of a survey</p>
	<p>Technical Data: I.P, GEO location, Strictly Necessary Cookies (Anti-Fraud/Security)</p> <p>Special Category Data: Health Data</p>	<p>Necessary to comply with a legal obligation</p> <p>Explicit Consent of the Data and Vital Interests of the Data Subject Where applicable you may provide us with details of special requirement you may have, such as any health conditions</p>
<b>Kids Club Facility</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for use of parking facilities.) Financial Data: Bank Card Details</p>	<p>The processing is necessary for the performance of a contract to which the data subject is party.</p> <p>The processing is in our legitimate interests where we may engage with you afterwards for direct marketing purposes or through the provision of a survey</p>
	<p>Special Category Data: Health Data</p>	<p>Personal data of Children (Minors) will be processed when a parent/guardian avails of our kid's club. This may also include Special Category Data of a Minor</p>
		<p>Explicit Consent of the Data Subject and Vital Interests of the Data Subject. Where applicable you may provide us with details of special requirement your child may have, such as any health conditions</p>
<b>Registering Interest/Sales Enquiry</b>	<p>Identity &amp; Contact Data: Name and Contact details.</p>	<p>To takes steps prior to the entry into a contract with you and for our Legitimate Business Interests</p> <p>When an individual visits our website and registers interest in any of our Hotels/Facilities. Contact details are collected in order provide information to the relevant Hotel for follow up.</p>
<b>Customer Care</b>	<p>Identity &amp; Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for use of parking facilities.) Also notes of your calls with our staff on our database.</p>	<p>This processing is necessary for the performance of a contract and to keep a record of your interactions with us.</p>
		<p>The processing is in our legitimate interests to assist in monitoring and training our staff</p>

		and for the purpose of identity verification and in order to assist the relevant queries.
<b>Marketing to Potential Customers and Existing Customers</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history)	<p><b>Where you are a Potential Customer.</b> We will rely on your consent to communicate to you.</p> <p><b>Where you are a Customer.</b> You have not opted out of the processing.</p> <p><b>Where you are a Business Prospect or Business Customer.</b> You have has not opted out of the processing.</p> <p>The above is in our legitimate interests to develop our business by providing information that is relevant and where the data subject has not opted out of the processing.</p>
<b>Incomplete Transactions &amp; Reservations</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, current vehicle details for use of parking facilities.)	To re-engage with customers and prospects on reservations that are incomplete. The processing is in our legitimate interests to meet the customers pre-contractual requests and to manage hotel occupancy
<b>Customer Satisfaction Survey</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history)	The processing is in our legitimate interests to ensure the quality of services provided by our hotels, facilities, and our staff.
<b>Quality Improvement / Staff Training</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history)	The processing is in our legitimate interests in providing a high standard of services to our customers, by assessing the ongoing development and identifying areas for improvement.
	All, written communications, and communications received through the web are stored by us.	
<b>Security</b>	Identity Data CCTV (Images)	The processing is in our legitimate interests. We operate a CCTV system on our premises for the safety and security of our staff, visitors, and business assets.
<b>Legal Obligation</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history)	We may use your personal information to comply with various legal obligations to which we are subject including.
	Special Category Data: Health Data	Maintaining a register of guests
	Financial Data: Bank Card Details	Making a payment of VAT in respect of the sale of a service/product
		COVID 19 Contact Tracing Logs

<b>To understand our customer base</b>	Identity & Contact Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history)	<p>We may use your personal information on an aggregate basis for market research purposes to help us understand our customer base.</p> <p>We rely on our legitimate interest in order to understand our customer base.</p>
<b>Business needs</b>	Identity & Contact Data: General Data: Name, contact details (may include postal address, email address, telephone numbers, gender, purchase history and service used)	<p>We may also use your personal information to manage our everyday business needs, including accounting, sharing your information within our collection for administrative purposes, and to prevent fraud.</p> <p>We rely on our legitimate interest in the effective management of our business</p>
<b>Website Security</b>	Technical Data: I.P Address, device details, Geo Location	<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p> <p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<b>Website analytics</b>	Technical Data: Consent preference, cookie data, IP address, Cookie I.D, device details, purchasing tendency, interests, sites visited, history of interactions on the site or platform, geo location	<p>With your consent where your data has been collected through our website and social media platforms.</p> <p>We use the data to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy</p>

## 10. Who do we share information with?

**Third Party Service Providers:** TTC discloses Personal Data to third parties in certain instances. For example, TTC uses third party service providers for the processing of Personal Data for a number of purposes, including, security service providers, consultant advisors, I.T service providers, printers, debt collection agencies, booking agents, CRM providers, membership service providers valuers, marketing companies who carry out marketing campaigns, market research or customer satisfaction surveys on our behalf and providers of security and administrative services. These service providers are subject to a contractual obligation to only process Personal Data obtained from TTC for purposes for which it was obtained and in accordance with TTC instructions.

TTC will not provide your Personal Data to third parties who may contact you for direct marketing or promotional purposes unless you have consented to TTC disclosing your Personal Data to such third parties for that purpose.

In certain circumstances TTC will disclose personal data to other external third parties such as its professional advisors as necessary in the context of the performance of their services. Such recipients may include external legal advisors, auditors, actuaries, pension and tax advisors, pension administrators and other professional advisors.



Disclosure of such data will take place for a variety of reasons including in order to ensure that TTC meets its tax and other statutory obligations.

TTC may also disclose personal data to its insurance providers in connection, with legal claims and prospective legal claims or proceedings.

**TTC and other TTC entities:** As we are part of a large collection of Hotels, and we may pass your information on to other hotels within our group for the purpose of administrative efficiencies, for fulfillment of a contract and for storing your data in central IT Systems. We may also convert your information, such as information you provided during a customer satisfaction survey, into statistical or aggregate data in such a way as to ensure that you are not identified and are indefinable from it. We may share this information across the collection, for analytical and statistical purposes. We may share your personal data for marketing purposes within our group, but only where you have consented to same.

**Website Partner:** We partner with Net Affinity who support this website and who operate as our booking partner and digital marketing service provider. For further information on Net Affinity please see their website [Partners \(netaffinity.com\)](https://netaffinity.com)

**Insurance Companies:** We may disclose personal data to our insurance providers in connection, with legal claims and prospective legal claims or proceedings.

**Potential Sale or Merger:** If we sell any part of our business and/or integrate it with another organisations, your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs, the new owners of the business will only be permitted to use your information in the same or similar way as set out in this data protection statement.

**Garda Síochána, Government or Quasi-Government Bodies, Courts, and Tribunals:** We may share your personal information with these organisations and bodies, where required to do so by law.

## 11. Storage Periods

The period for which we will keep your personal information will depend on the service you have requested from us. The retention period may be longer than the period for which we are providing services to you where, for example, we have a legitimate interest in retaining such information that is not outweighed by your fundamental rights and freedoms, or where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in the event of a legal claim.

We endeavor to ensure that Personal Data is retained for an appropriate period and no longer than necessary. Retention of data is detailed in our Data Retention Policy.

## 12. Transfers outside the European Economic Area

We may transfer, store, or process your personal information in countries outside the European Economic Area. Where the laws of such countries do not afford an equivalent level of protection of personal information as the laws of Ireland, we will take specific steps in accordance with data protection law to protect your personal information.

We will use one of these safeguards:

- Transfer to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract (in a form that is approved by the European Commission) with the recipient of the personal information that means they must protect it to the same standards as the EEA
- Transfers to organisations that are part of an EU Framework that sets privacy standards for data sent between countries. These frameworks make sure those standards are similar to what is used within the EEA.

Currently we engage the following entities to support our business activities, some of these entities are based outside the EEA

Name	Service	Location
Mailchimp	Mailing Service	USA
Ashbourne Management Services	Gym membership management software	UK

Google LLC	Website Analytics	EU/USA
Net Affinity Limited	Website Partner	EU (Ireland)
Guest Joy Limited	Booking Services, CRM,	EU (Estonia)

**13. Marketing Communications**

If you are not a customer of TTC and you provide consent for marketing communications TTC may use your name, address, email address, postal address and/or telephone number for marketing communications. TTC will not contact users by email, phone, or SMS for direct marketing purposes unless the users have consented to be contacted for such purposes as required by data protection laws.

Where you are a customer of TTC or an individual hotel within our group, a legitimate interest assessment will be conducted to ensure there is an appropriate balance between our interests and your rights and freedoms, the right to object will be presented in all marketing communications. Customers can opt-out of receiving direct marketing communications from TTC by following the unsubscribe link in the relevant marketing message.

If a customer signs up to receive marketing communications from all hotels within the TTC and provides their contact details to TTC for such purposes, we will provide your name and contact details (e.g., email or mobile number) across the collection so that the individual hotel(s) can send you marketing communications. If a user opts-out from receiving communications from the collection, TTC will no longer share that user’s contact details and will remove the user from such marketing communications.

TTC will not provide your personal data to any other third parties for direct marketing purposes unless the users have consented to TTC giving their Personal Data to third parties for that purpose.

If a user opts-out from receiving communications from these third parties. TTC will no longer share that user’s contact details. However, users will still need to directly opt-out from communications from the partners to whom we have already given their information.

TTC uses third party service providers to help deliver its marketing communications. Those third-party data processors are subject to contractual and legal restrictions in relation to any unauthorised use of your information.

**14. How we use automated processing**

We may analyse your personal information by automated means for the purposes of market research, analyzing our customer database and for our marketing activities. You have a right to object to this processing at any time by contacting us on the details provided below.

**15. Processing for Security Purposes**

We operate closed circuit television cameras ("CCTV") throughout our premises covering buildings, internal spaces, car parks, roads, pathways, and grounds. Our CCTV system is implemented in a proportionate manner as necessary to protect our property against theft or pilferage and for the security of employees, customers, and visitors to TTC premises (to protect their vital interests). Whilst CCTV footage is monitored by our, senior management, security staff or contractors, access to recorded footage is strictly limited to authorized personnel. Footage is retained for 90 days, except where incidents or accidents have been identified in which case such footage is retained specifically in the context of an investigation of that issue. CCTV footage may be used in the context of disciplinary proceedings involving TTC employees and to detect, establish and/or defend legal proceedings (to protect the vital interests of our, staff and affected individuals). CCTV footage is not disclosed to third parties except where disclosure is required by law (such as for the purpose of preventing, detecting, or investigating alleged offences) and in such instance’s disclosure is based on a valid request. Signage indicating that CCTV is in use is displayed throughout our premises.

**16. If you fail to provide personal data**

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. 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.

**17. Information Security**

In accordance with applicable laws, we aim to ensure that all Personal Data controlled by us is held securely using appropriate security measures including the following:

In the event of a personal data breach, we will comply with applicable reporting and notification obligations under data protection law. TTC has in place a Breach Notification Policy.

## **18. Your Rights**

In certain circumstances, you have the following rights under data protection law in relation to your personal data:

### A right to access Personal Data held by TTC

- (a) Any individual has a right to make an access request, in writing, under data protection law for a copy of their Personal Data held by us. We may ask for further identification details to confirm your identity before the relevant information is provided.
- (b) It should be noted that there may be specific exemptions relating to accessing Personal Data. If we utilise any of the exemptions, we will provide you with details and our justification for their use.

### Other data protection rights

- (a) Rectification of inaccurate personal data;
- (b) Erasure of personal data (also known as the "right to be forgotten");
- (c) Restriction of processing of personal data;
- (d) Right to data portability;
- (e) Right to object to processing of personal data.

However, under data protection law, these rights are available only in certain circumstances. If you wish to exercise any of your data protection rights, please contact us by using the contact details below.

We will endeavor to respond to your request within a month. If we are unable to deal with your request within a month, we may extend this period by a further period of two months, and we will explain why. Please provide as much detail as possible to enable us to respond to your request and to locate relevant personal data about you.

By Post: Designated Privacy Representative, Talbot Hotel Limited, The Quay, Wexford

By Email: [datarequest@talbotcollection.ie](mailto:datarequest@talbotcollection.ie)

By Phone: + (0) 91 22566

You also have the right to lodge a complaint to the Office of the Data Protection Commission. For further information please see [Data Protection Commission](#)

## **19. Updates**

This policy ["version 2"] was updated and deemed effective on the 20<sup>th</sup> of May 2022. We will update this data protection statement from time to time. Any updates will be made available on our websites at [Our Hotels | Wexford | Cork | Dublin | Carlow | Tipperary \(talbotcollection.ie\)](#) and, we would ask that you check regularly.