

# PRIVACY POLICY

EFFECTIVE DATE: 1 OCTOBER 2012

To access your information, ask questions about our privacy practices, change your marketing preferences or issue a complaint, contact us at:

Park Plaza Hotels Europe B.V.  
Vinoly Tower 5th floor  
Claude Debussylaan 14  
1082 MD Amsterdam  
The Netherlands

Email: [privacy@pphe.com](mailto:privacy@pphe.com)

## WHAT THIS POLICY COVERS

This privacy policy is provided by Park Plaza Hotels Europe B.V. (“we”, “us” or “our”) in connection with the use of this website and other websites operated or hosted by us, or on our behalf, (“sites”), reservations made for hotels trading under the “Park Plaza” and “Plaza on the River” brands primarily located in Europe, Middle East and Africa (the “Territory”) and for hotels trading under the “art’otel” brand located worldwide and certain other bars, restaurants and spas, all as operated by PPHE Hotel Group Limited and/or each of its subsidiaries (“PPHE”). This Privacy Policy also applies to personal information collected whilst completing the check-in process at the PPHE hotels and to personal information provided by you to us through any of our marketing tools at any of our restaurants, bars and spas. Please click [here](#) for a list of our sites.

Park Plaza Hotels Europe B.V. is a wholly owned subsidiary of PPHE Hotel Group Limited, a company registered in Guernsey. PPHE Hotel Group Limited’s shares are admitted to trading on the main list of the London Stock Exchange (Standard Listing).

Please note that this Privacy Policy does not relate to:

1. Hotels owned, operated and/or franchised by Radisson Hospitality,, Inc. and/or its subsidiaries (together “Radisson Hotel Group”) which are branded “Park Plaza” and located outside the Territory. When you provide personal information to such Radisson Hotel Group their privacy policy applies; and
2. The privacy practices of PPHE hotels owned and operated by independent franchisees, including bars, restaurants and spas operated from such hotels. When you provide personal information directly to one of our franchisees, the franchisee’s privacy policy will apply.

PPHE Services are those which require interaction with Radisson Hotel Group’ websites; [www.parkplaza.com](http://www.parkplaza.com) or [www.artotels.com](http://www.artotels.com), or any of our sites and/or include making reservations, bookings, cancellations or other changes or joining or making use of loyalty programmes membership and completing the check-in process at a hotel or making reservations or bookings offline or making use of any of our restaurants, bars and spas.

If you choose to leave our sites via links to other non-PPHE websites, including those of advertisers or independent franchisees, we are not responsible for the privacy policies or contents of those websites, nor are we responsible for the cookies those websites use.

This Privacy Policy describes how PPHE collects, uses, shares and protects personal information collected from the sources identified above. “Personal information” is information recorded in any format that identifies you personally, by itself or together with other information that is available to us.

# PRIVACY POLICY

## YOUR ACCEPTANCE OF THESE TERMS AND CONSENT TO THIS PRIVACY POLICY

By using our sites, participating in our programmes, using our facilities and/or completing the check-in process at the PPHE hotels you agree to this Privacy Policy and are agreeing for us to use your personal information in accordance with this statement and the applicable laws. By using our sites, you also agree to our Terms of Use.

Where you provide personal information about others to us (for example, the name, address and contact details of your travel companion), we rely on you to obtain that person's consent to our use of their personal information in accordance with this policy. By submitting their personal information you agree to obtain their consent on our behalf.

We will keep your personal information in a form which permits your identification for no longer than is necessary for the purposes for which we collected it, or for shorter periods where required by law. Please note that under the Terms of Use of our sites, we are entitled to change both the Privacy Policy and Terms of Use from time to time.

This Privacy Policy may be supplemented or amended by privacy notices provided at the time we collect specific personal information. In addition, we reserve the right, at our discretion, to make changes to this Privacy Policy at any time so you should check it from time to time.

If we make any changes to this Privacy Policy, we will replace this Privacy Policy with the new Privacy Policy and change the 'effective' date at the top of this Privacy Policy for at least 10 days after the new effective date.

By continuing to use our sites, participate in our programmes and/or stay at our hotels, you are agreeing to any changes to this Privacy Policy.

## WHY DO WE COLLECT INFORMATION?

We collect information from you to make it easier for you to use our services and to optimise your experiences, for example, so that you can receive our newsletters or be provided with selected business information which you may have requested, or to enable you to learn about and benefit from our tailored PPHE Services and related promotions and offers.

Depending on the nature of your visit, and the path you will follow through our sites, you may be asked at various times to provide us with information such as your name, address, e-mail address and certain preferences in connection with any plans we may have from time to time to provide marketing communications via a variety of media.

## WHO IS COLLECTING THE INFORMATION?

The information that you provide is collected by us. We are a member of a group of companies ultimately owned by PPHE Hotel Group Limited, operating in the business of hospitality, travel and e-commerce primarily in Europe, the Middle East and Africa. Our customer-focused initiatives are designed to deliver a broad range of personalised products and services to our customers. Internally, a limited number of persons from our marketing, business development and customer loyalty divisions are likely to access your information to process it in accordance with the terms of the present policy and in compliance with European regulations, notably the European Directive 95/46/EC on the protection of individuals with regard to the processing of personal data.

Some of the PPHE hotels, bars, restaurants and spas are owned and operated by independent franchisees. This policy does not cover our franchisees' privacy practices. When you provide personal information directly to one of our franchisees, the franchisee's privacy policy will apply. Whenever you use the PPHE Services, your personal information may also be collected by Radisson Hotel Group as the host of [www.parkplaza.com](http://www.parkplaza.com) and [www.artotels.com](http://www.artotels.com) to the extent necessary to fulfil our services and to enable you to receive hotel-services information from Radisson Hotel

# PRIVACY POLICY

Group. Please note that our hotels participate in the loyalty programme “Radisson Rewards” operated and owned by Radisson Hotel Group for which programme Radisson Hotel Group are solely responsible including any privacy issues relating to it (for Radisson Rewards privacy policy, please see [www.radissonrewards.com](http://www.radissonrewards.com)).

## WHAT INFORMATION DO WE COLLECT?

The collection of information is done in several different ways. We collect the domain name of visitors to our sites, the e-mail addresses of those visitors who volunteer them, user-specific information on the pages that visitors access, name, title and address, gender and nationality, passport number and date and place of issue, travel history, payment information, guest preferences, marketing preferences, dates of stay, preferred communication methods, method of payment, credit card details, including the three or four digit CVV code, amount of charges for stays at properties and information such as survey information, postal address, telephone numbers and site registrations that visitors provide voluntarily.

If you choose to participate in our sponsored social media activities or offerings, we may collect certain information from your social media account with your permission, such as location, check-ins, activities, interests, photos, status updates, publicly available comments and friends list.

We do not knowingly collect personal information from children under the age of 16. If you believe your child has provided personal information to us, please follow the procedure set out below for removal from mailing list to delete your child’s personal information.

## COOKIES

Like many other commercial websites, our sites may employ a standard technology called a “cookie” to collect information about how our sites are used. Information about cookies can be obtained from [www.allaboutcookies.org](http://www.allaboutcookies.org), but we generally use a range of session, persistent and third party cookies. Respective illustrations of the purposes of doing so include: storing information about your preferences, compiling anonymous statistics about the manner in which our are accessed and used, assisting you to retrieve stored information you have provided, recognise you when you return to our sites, tailor the third party adverts featured on our sites for your visits and to provide security with your transactions.

Your continued use of our sites represents your consent to our use of cookies as described. You can set your browser not to accept cookies and [www.allaboutcookies.org](http://www.allaboutcookies.org) tells you how to remove cookies from your browser. However, please note that certain features of our sites require cookies in order to function. Please see our Cookies Policy for details. (Ensure there is a link to the cookie policy!)

## HTML EMAIL WEB BEACONS

Our emails may contain a single, campaign-unique “web beacon pixel” to tell us whether our emails are opened and verify any clicks through to links or advertisements within the email. We may use this information for purposes including determining which of our emails are more interesting to users, to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email.

## WHAT DO WE DO WITH THE INFORMATION WE COLLECT FROM YOU?

As well as using the information to enable you to use our services and to optimise your experiences, we use the information that we collect from you to understand your preferences and history in regards to our products and services. With this information we can tailor our services and special

# PRIVACY POLICY

offers to provide superior levels of convenience and service on a one-to-one basis. We also use the collected information to improve the design of our sites' pages. Information about your preferences is only used as described in this policy and, generally, to help us understand the products and services that might be attractive to you. If you provide us with your e-mail address, we may occasionally send you e-mail offers and / or updates, informing you about products and services provided by us and third parties that we think will be of interest to you. If you provide us with your postal address, you may receive periodic mailings from us with information on new products and services or upcoming events. These offers may be based on information you provided us in your responses to our surveys and on your history with us as a customer. Please e-mail [privacy@pphe.com](mailto:privacy@pphe.com) or post by pre-paid mail your written opt-out request to Park Plaza Hotels Europe B.V., Vinoly Tower 5th floor, Claude Debussylaan 14, 1082 MD Amsterdam, the Netherlands to unsubscribe from our mailings.

In addition, we can also use the e-mail addresses of the subscribers from our e-mail marketing database for Custom Audience targeting through Facebook. We create a Custom Audience by uploading the e-mail addresses of our subscribers into an advertising tool. After that, the group can then be connected to a specific Facebook campaign and only these Facebook users will be able to see the campaign. You can read more about Custom Audience targeting here: <https://developers.facebook.com/docs/marketing-api/reference/custom-audience>. If you do not want to receive any (digital) newsletters, or do not want to take part in the Custom Audience advertising tool, you can notify us at the following e-mail address: [socialmedia@pphe.com](mailto:socialmedia@pphe.com)

## SHARING YOUR INFORMATION WITH OTHERS

We share your personal information with Radisson Hotel Group to the extent necessary to complete our services to you (e.g. reservation, cancellation, booking changes and loyalty programme membership, among other things) and to enable Radisson Hotel Group to provide you with their hotel-services information. We will share your personal information with other third parties we retain, including, but not limited to, the hotel owner or operator of your chosen hotel, bar, restaurant or spa, to assist us to provide our services to you or process your information on our behalf, on the basis that those third parties agree to use the personal information we share with them only for the limited purposes for which we provide it to them and within the scope of use set out in this Privacy Policy and to take reasonable measures to protect the confidentiality, integrity and security of your personal information.

Although unlikely, we may disclose your personal information to third parties, the court services and/or regulators in connection with proceedings or investigations.

In the event that Park Plaza Hotels Europe B.V. (or a part thereof or member of its group) is sold to a third party or undergoes a re-organisation, you agree that any of your personal information which it holds may be transferred to that re-organised entity or third party and used for the same purposes.

## WHERE YOUR INFORMATION IS STORED

Our sites and databases currently reside on servers in the European Economic Area and the USA; we co-operate with sub-contracted data processors in various countries. We request data processors to strictly adhere to the data protection legislation pursuant to the EU Directive 95/46/EC and we instruct our partners accordingly. Data is sent on to Radisson Hotel Group' server in the United States in order to affect reservations, cancellations, booking amendments in the central reservation system located in Omaha, Nebraska, USA. Different countries have different data protection laws, some of which provide more protection than others. If and when we transfer your personal

# PRIVACY POLICY

information from one country to another country, we take appropriate measures to protect your privacy and personal information in accordance with the EU legislation for international data transfers (for example, Radisson Hospitality Inc has certified that it adheres to the EU/Swiss-US Safe Harbor Framework regarding collection and use of personal information from the EU and Switzerland). By using our sites, participating in our programmes, or staying at a PPHE hotel or by using a PPHE Service, you are consenting to the transfer of your personal information to any country in the world in accordance with the terms of this policy.

## ACCESS TO YOUR PERSONAL INFORMATION AND REMOVAL FROM OUR MAILING LISTS

In accordance with the applicable EU legislation, you have the right to contact us to access the data we store about you, to have it updated or deleted subject always to any applicable law or regulation. To do so please email [privacy@pphe.com](mailto:privacy@pphe.com) with the subject line “personal data about me” and set out which information you wish us to update or delete and we will address your request as promptly as we can and in any case within three weeks of receiving the request.

If you do not want to receive posted or email offers from us, please let us know by following the instructions in our emailed offers or by emailing all relevant details to [privacy@pphe.com](mailto:privacy@pphe.com) with the subject line “interruption of offers”. If you want to be removed from our postal mailing list, please e-mail [privacy@pphe.com](mailto:privacy@pphe.com) or post by pre-paid mail your written opt-out request to Park Plaza Hotels Europe B.V., Vinoly Tower 5th floor, Claude Debussylaan 14, 1082 MD Amsterdam, the Netherlands, in either case, with the subject line “interruption of postal mailing” and your complete name, address and make reference to the offer you do not want to receive any longer. Please note that opting-out of one type of marketing communication will not necessarily result in opting-out of other types of marketing communication (unless we decide to effect this in our sole discretion or you notify us to do so) and opting out of all marketing communications will not prevent transactional information from being sent to you (typically, reservation confirmation). Please note that opting-out of our database will not result in opting-out of any communication by Radisson Hotel Group (including a Radisson Rewards communication).

## DATA FROM OTHER SOURCES

In the course of providing PPHE Services, we may also collect personal information otherwise than through the sites, for example, through the provision of guest satisfaction surveys, the completion of the check-in process at a hotel or through marketing registration cards used at any of our restaurants, bars and spas. By using our sites, using a PPHE Service or completing a marketing registration card, you are agreeing to our use of this personal information in accordance with the terms of this policy.

Upon check-in at the hotel, the hotel owner will also collect personal data. The relevant hotel will collect, control and manage the personal information collected upon check-in and the hotel owner’s use of such information will be subject to the offline data privacy policy which will be available (upon request) at the front desk of the hotel. Such data may be passed to us in accordance with this policy.

## SECURITY PROCEDURES

We implement what we believe to be appropriate and proportionate physical, technical and organisational security for the management and transmission of personal data, including appropriate security measures designed to protect such data from accidental or unlawful destruction or

# PRIVACY POLICY

accidental loss, misuse, alteration, unauthorised disclosure or access and all other unlawful forms of processing.

Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised individuals have access to the information provided by our customers. The website owner is not liable for personal data lost in transmission to the website.

## List of Our Sites

[www.pphe.com](http://www.pphe.com)

[www.parkplazasherlockholmes.com](http://www.parkplazasherlockholmes.com)

[www.parkplazacountyhall.com](http://www.parkplazacountyhall.com)

[www.plazaontheriver.co.uk](http://www.plazaontheriver.co.uk)

[www.chinolatino.eu](http://www.chinolatino.eu)

[www.primobar.co.uk](http://www.primobar.co.uk)

[www.ichisushi.co.uk](http://www.ichisushi.co.uk)

[www.brasseriejoel.co.uk](http://www.brasseriejoel.co.uk)

[www.tozirestaurant.co.uk](http://www.tozirestaurant.co.uk)

[www.5and33.nl](http://www.5and33.nl)

[www.artotels.com](http://www.artotels.com)

[www.artotelamsterdam.com](http://www.artotelamsterdam.com)

[www.artotellondonbattersea.com](http://www.artotellondonbattersea.com)

[www.106bakerst.co.uk](http://www.106bakerst.co.uk)

[www.oaksnottingham.co.uk](http://www.oaksnottingham.co.uk)

[www.babeefclub.com](http://www.babeefclub.com)

[www.upsidedownbar.com](http://www.upsidedownbar.com)

[www.florentinerrestaurant.co.uk](http://www.florentinerrestaurant.co.uk)

## List of Independent Franchisees

Park Plaza Cardiff

Park Plaza Trier