

# Policy Document

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## **CTH PRIVACY POLICY** **SEPTEMBER 2020**

# Contents

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		<b>Page</b>
<b>1.</b>	Introduction	<b>2</b>
<b>2.</b>	What Personal Data do we Collect?	<b>3</b>
<b>3.</b>	How do we use your Personal Data?	<b>4</b>
<b>4.</b>	Your Rights	<b>6</b>
<b>5.</b>	Miscellaneous	<b>8</b>

# 1. Introduction

## Who we are and what this document is for

The Confederation of Tourism & Hospitality (CTH) is committed to data security and the fair and transparent processing of personal data. This privacy policy (the Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

The Confederation of Tourism & Hospitality Ltd is a non-profit-making company, with registered UK company number 02090576. Our registered address is 37 Duke Street, London W1U 1LN.

For the purposes of the GDPR, CTH is the 'controller' of the personal data you provide to us.

The prime contact for privacy and data protection matters at CTH is Simon Cleaver, Director of Partnerships. You may contact him by sending an email to [simon.cleaver@cthawards.com](mailto:simon.cleaver@cthawards.com). Alternatively please contact any member of the CTH team.

CTH owns and operates [www.cthawards.com](http://www.cthawards.com) and [members.cthawards.com](http://members.cthawards.com) (the Website).

This Policy, together with our Website terms of use and any other documents referred to in them, sets out the basis on which CTH processes personal data.

## 2. What Personal Data do we Collect?

We may collect and process the following personal data:

### **Information we collect about you**

If you are a student, tutor/lecturer or administrator at a CTH Approved Teaching Centre, we may receive information about you from the Centre when they register or liaise with us to receive products and/or services from us.

### **Information you provide to us:**

If you:

- complete a form on our Website;
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- register as a student directly with us;
- enter into a contract with us to receive products and/or services,

we may collect your name, date of birth, e-mail address, postal address, telephone number and other data that you supply at that time.

*16 or under?* If you are aged 16 or under you must get your parent/guardian's permission before you provide us with your personal information. Unless you have this consent you are not allowed to give us your information. We will not gather, hold or process any information without such consent

### **Information about other people**

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

### **Sensitive personal data**

In certain very limited cases, we may collect certain sensitive personal data from you (defined as information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Some web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## 3. How do we use your Personal Data?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

### **Contract performance:**

We may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services to you;
- to communicate with you in relation to the provision of the contracted products and services;
- to provide you with administrative support such as account creation, security, and responding to issues; and
- provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

### **Legitimate interests:**

Where this is necessary for purposes which are in our, or third parties, legitimate interests.

These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by CTH which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.

Note: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

### **Consent:**

Where you have given your express consent to receive marketing communications, we may use your personal data to:

- send you newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by CTH which may be of interest to you;
- developing, improving, and delivering marketing and advertising for products and services offered by a CTH.

**Where required by law:**

We may also process your personal data if required by law including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

**Who do we share your personal data with?**

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

**How long will we keep your personal data?**

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for an indefinite period following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities. Specifically, student registration and results data will be kept in perpetuity to enable us to confirm validity of awards on request.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us. Consent for marketing communications will be deemed to expire after three years unless renewed.

**Where do we store your personal data and how is it protected?**

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify

you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## 4. Your Rights

Under the GDPR, you have various rights with respect to our use of your personal data:

### **Right to Access**

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

### **Right to rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

### **Right to erasure**

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

## **Right to object**

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

## **Right to restrict processing**

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

## **Right to data portability**

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

## 5. Miscellaneous

### Contact

If you would like to contact us about this Policy, our use of your personal data, or about exercising any of your rights, please contact us For further information or guidance please contact:

The Confederation of Tourism & Hospitality  
37 Duke Street  
London W1U 1LN  
United Kingdom

Tel: +44 (0)20 7258 9850  
Email: [info@cthawards.com](mailto:info@cthawards.com)  
Web: [www.cthawards.com](http://www.cthawards.com)

### Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

### Changes to our Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified by e-mail. Please check back frequently to see any updates or changes to our Policy.