

## PRIVACY POLICY

### HOTEL ANFIELD – PRIVACY POLICY

Happy Days Hospitality Ltd & Happy Elsa Ltd: Trading as Hotel Anfield

Your privacy is important to us. We're committed to protecting and safeguarding any personal data you give us.

This document describes how we use and process your personal data, it also tells you how to contact us if you have questions about your personal data.

Happy Days Hospitality Ltd & Happy Elsa Ltd offer online travel-related services & event services through our own website, as well as through other online platforms like partners' websites and social media. All the information that follows applies to all of these platforms. We have several platforms, but one Privacy Statement.

This one Privacy Statement applies to any kind of information we collect through these platforms or other means connected to these platforms (such as contacting our Customer Service team by email). We might amend the Privacy Statement from time to time.

If you disagree with this Privacy Statement, you should discontinue using our services. If you agree with our Privacy Statement, then you're all set to book your next stay.

What kind of personal information does Hotel Anfield collect?

When you use our services there are certain pieces of information we ask for – your name, preferred contact details, the names of anybody travelling with you, and your payment information. In addition to this, we also collect information from your computer. This can include the IP address, the browser you're using, and your language settings. There are also situations when we receive information about you from others or automatically collect other information.

Why does Hotel Anfield collect and use your personal data?

The main reason we ask you for personal details is to help administer your bookings, ensure you get the best service possible, and keep your information safe. We also use your personal data to contact you and inform you about our latest deals and special offers.

How does Hotel Anfield share your data with third parties?

There are different parties integrated into the Hotel Anfield services in various ways and for various reasons. The primary purpose is to share your reservation data with a booking agent if your booking is not made directly with us. There are also other parties which can receive some of your data, which are parties we involve to provide you with the Hotel Anfield services, financial institutions, advertisers, or in some

cases authorities. Below we'll go into more detail about how information you share with us is used and exchanged with these parties.

How does Hotel Anfield process communications that you send to Hotel Anfield?

Hotel Anfield can help you and accommodation partners exchange information and requests about accommodations and existing reservations, directing the communications through Hotel Anfield.

How does Hotel Anfield use mobile devices?

We offer a mobile version of our website to collect and process personal data through. This works in the same way as our website but in the palm of your hands wherever you are.

How does Hotel Anfield use social media?

The use of social media services may be integrated within the Hotel Anfield services in various ways, which can involve us collecting some of your personal data or the social media provider receiving some of your information.

What security and retention procedures does Hotel Anfield put in place to safeguard your personal data?

In accordance with European data protection laws, we observe reasonable procedures to prevent unauthorised access to, and the misuse of, personal data.

How does Hotel Anfield treat personal data about children?

Hotel Anfield is a service you're only allowed to use if you're over 18 years old. We only process information about children with the consent of the parents or legal guardians.

How can you control the personal data you've given to Hotel Anfield?

You always have the right to review the personal information we keep about you. You can request an overview of your personal data by emailing us at the email address listed below. Please write "Request personal information" in the subject line of your email.

Who is responsible for the processing of personal data on the Hotel Anfield website?

Hotel Anfield., located in Liverpool, Merseyside, controls the processing of personal data on its website.

What kind of personal information does Hotel Anfield collect?

Here is an in-depth view of the information we collect.

Personal information you give to us

Hotel Anfield collects and uses information that you provide to us. When you make a reservation, you're (as a minimum) asked for your name and email address. We might also ask for your home address, telephone number, payment information, the names of any guests travelling with you, and any preferences you might have for your stay.

If you need to get in touch with our customer service team, or reach out to us through another avenue (such as on social media, or communicating through your third-party booking agent if not booking directly), we'll collect information from you there, too. After a stay, guests can be asked to provide a review to help ensure future guests get exactly what they're looking for.

There are also other instances where you'll provide us with information. For example, if you're browsing with your mobile device, you can enable Hotel Anfield to see your current location or grant access to your contact details – this helps us provide you with the best possible service.

#### Personal information you give us about others

Maybe you're travelling with other guests whose details you provide as part of the reservation, or you might make a reservation on behalf of someone else.

We should point out that it's your responsibility to ensure that the person or people you've provided personal information about are aware that you've done so, and have accepted how Hotel Anfield uses their information (as described in this privacy statement).

#### Personal information we collect automatically

Even if you don't end up making a reservation, when you visit our websites we may automatically collect certain information. This includes your IP address, the date and time you accessed our services, the hardware, software or internet browser you use, and information about your computer's operating system, like application versions and your language settings. We might also collect information about clicks and which pages have been shown to you.

If you're using a mobile device, we might also collect data that identifies your mobile device, device-specific settings and characteristics, location details, app crashes and other system activity. When you make a reservation, our system registers through which means and from which websites you've made your reservation or entered the Hotel Anfield websites and/or apps.

#### Personal information we receive from other sources

We might also receive information about you from other sources. These include business partners like affiliate partners and other independent third parties. Anything we get from them might be combined with information provided by you. For example, the Hotel Anfield reservation services aren't only made available through Hotel Anfield but are also integrated into affiliate partner services you can find online. When you use some of these, you provide the reservation details to our business

partners, who then forward your details to us. We also integrate third party service providers to help with payment between you and us. These service providers share payment information so we can manage and handle your reservation, making sure everything goes as smoothly as possible for you.

We might also receive information about you to show you more relevant ads. Read under “Why does Hotel Anfield collect and use your personal data?” for more information.

Third-party booking agents are allowed to share information about you with Hotel Anfield too – this might happen if you have support questions about your pending reservation, when disputes arise about a reservation, or there’s other communication about your reservation through Hotel Anfield.

Why does Hotel Anfield collect and use your personal data?

We use the information collected about you for various purposes. Your personal data may be used in the following ways:

**Reservations:** First and most importantly, we use your personal data to complete and administer your reservation. We may also offer you other travel-related products and services from third parties. These will be through our online services and speaking directly to you over the telephone, and if you choose to utilise these, we’ll use your information to complete and administer your order just as we would if you booked accommodations only.

**Customer Service:** We provide customer service from our head office, and we’re there to help 24/7. Sharing your details with our customer service staff allows us to respond when you need us – including responding to any questions you might have about your reservation (plus any other questions, too).

**Marketing Activities:** We also use your information for marketing activities. These activities may include:

Using your contact information to send you news of travel-related products and services when you make a reservation with us. You can unsubscribe from these marketing communications quickly, easily and anytime – just click on the “Unsubscribe” link included in every newsletter.

Based on the information you share with us, individualised offers may be shown to you on our social media sites. These can be offers that you can book directly on the Hotel Anfield site, or third-party offers or products we think you might find interesting.

When you participate in other promotional activities (such as competitions), relevant information will be used to administer these promotions.

**Communicating with You:** There may be other times when we get in touch with you, including by email, mail, phone or text message – which method we choose depends on the contact information you’ve previously shared with us. We process the

communications you send to us. There could be a number of reasons for this, including:

Responding to and handling any requests you or a third-party booking agent have made. Hotel Anfield also offers guests and third-party booking agents various means to exchange information, requests, and comments about accommodations and existing reservations directed through Hotel Anfield. For more information, scroll down a little and read the section titled “How does Hotel Anfield process communications that you and your third-party booking agent may send through Hotel Anfield?”

We may also send you other material related to your reservations, like how to contact Hotel Anfield if you need assistance while you’re away, and information that we feel might be useful to you in planning your trip or getting the best out of your stay. We may also send you material related to upcoming reservations or a summary of previous reservations you made through Hotel Anfield.

Even if you don’t have an upcoming reservation, we may need to send you other administrative messages, which can include security alerts.

**Promotion of a Safe and Trustworthy Service:** In order to create a trustworthy environment for you, your fellow travellers, Hotel Anfield’s business partners, and our third-party booking agents, we may use personal data for the detection and prevention of fraud and other illegal or unwanted activities. Similarly, we may use personal data for risk assessment and security purposes, including the authentication of users and reservations. For such purposes, we may have to put certain reservations on hold.

**Improving our Services:** We also use personal data for analytical purposes. This is part of our drive to improve our services and enhance the user experience, but can also be used for testing purposes, troubleshooting and to improve the functionality and quality of our travel services. The main goal here is to optimise and customise our online platform to your needs, making our site easier and more enjoyable to use.

**Guest Reviews and other Destination-related Information:** During and after your stay with us, you may be invited to submit a guest review. Whether it is direct with ourselves via the third party booking agent you booked your accommodation with. This may also enable guests travelling with you, or on whose behalf you’ve booked, to provide a review. This invite may ask for information about the accommodations, the destination, and other services you might have booked through Hotel Anfield (like attractions).

By completing a guest review, you’re agreeing that it can be displayed on our website, on our social media accounts or on the website of the relevant third party booking agent. This is to inform other travellers about the quality of your stay or other services you used.

During calls with Hotel Anfield support staff, live listening may be carried out or calls may be recorded for quality control and training purposes. Recordings are kept for a limited amount of time and automatically deleted, unless Hotel Anfield has a

legitimate interest to keep such recording for a longer period (as reasonably necessary), including for fraud investigation purposes. Any call recordings will be handled in accordance with this Privacy Statement.

**Legal Purposes:** Finally, in certain cases we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, or to enforce the terms of use of the Hotel Anfield online reservation service, as reasonably expected.

To process your information as described above, we rely on the following legal bases:

**Performance of a Contract:** The use of your information may be necessary to perform the contract that you have with us. For example, if you use our services to make a reservation, we'll use your information to carry out our obligation to complete and administer that reservation under the contract that we have with you.

**Legitimate Interests:** We may use your information for our legitimate interests, such as providing you with the best appropriate content for the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.

**Consent:** We may rely on your consent to use your personal information for certain direct marketing purposes. You can withdraw your consent anytime by contacting us at any of the addresses at the end of this Privacy Statement.

How does Hotel Anfield share your data with third parties?

In certain circumstances, we'll share your personal data with third parties.

**Your local Hotel Anfield Office:** In order to support the use of the Hotel Anfield services, your details may be shared with subsidiaries of the Happy Days corporate family.

**Third-party Service Providers:** We may use service providers to process your personal data on our behalf. This processing is for several purposes, including for example sending out marketing material. Third-party service providers are bound by confidentiality clauses and are not allowed to use your personal data for other purposes.

**Payment Providers and (other) Financial Institutions:** When a chargeback is requested for your reservation by either you or by the holder of the credit card used to make your reservation, we may need to share certain reservation details with the payment service provider and the relevant financial institution to handle the chargeback. This may also include a copy of your reservation confirmation or the IP address used to make your reservation. Also, we may share information with relevant financial institutions, if we consider it strictly necessary for fraud detection and prevention purposes.

**Competent Authorities:** We disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud. We may need to further disclose personal data to competent authorities to protect and defend our rights or properties, or the rights and properties of our business partners.

**Business Partners:** We work with many business partners. Some of these business partners distribute or advertise our services, as well as help our other business partners distribute and advertise their own travel-related services.

When you make a reservation on one of our business partners' websites or apps, certain personal data that you give them will be forwarded to us. If customer service is provided by the business partner, Hotel Anfield will share details relevant to your reservation with the business partners (as and when needed) in order to provide you with appropriate and efficient support. When you make a reservation through one of our business partners' websites, the business partners may receive certain parts of your personal data related to the specific reservation. This is for their own internal purposes (such as analytical purposes) and, if requested by you, for the administration of loyalty programs or marketing.

When you make a reservation on a business partners' website, please also take the time to read their privacy policies if you'd like to understand how these business partners may process your personal data. When we offer you other travel-related products and/or services, your information may be shared with the offering business partners to handle or administer your order. For fraud detection and prevention purposes and as strictly necessary, we may also exchange information about our users with business partners.

Some reservations are facilitated by third-party business partners. During the reservation process, we are required to share some relevant personal information for that reservation with the third-party business partner. Please review the information provided in the booking process or the reservation confirmation for more information about the third-party business partner and how they further process your personal data.

**Advertising partners:** As a way of marketing Hotel Anfield services through third-party business partners (to ensure relevant advertisements are shown to the right audience), we may share personal data with advertising partners. This includes your email address. We strive to only share email addresses in a hashed form so they can be matched to an existing customer database. We strive not to share your email address for any other purpose.

How does Hotel Anfield process communications that you and third-party booking agents may send through Hotel Anfield?

Hotel Anfield offers you and third-party booking agents various means to communicate about existing reservations, directing the communications through Hotel Anfield. You can contact Hotel Anfield with questions about your reservation through email and other channels that we may make available.

Hotel Anfield may access communications and may use automated systems to review, scan, and analyse communications for security purposes; fraud prevention; compliance with legal and regulatory requirements; investigations of potential misconduct; product development and improvement; research; customer engagement, including to provide you with information and offers that we believe may be of interest to you; and customer or technical support. We reserve the right to block the delivery of or review communications that we, in our sole discretion, believe may contain malicious content, spam, or may pose a risk to you, accommodation partners, Hotel Anfield, or others. Note, all communications sent or received using Hotel Anfield communication tools will be received and stored by Hotel Anfield. Business partners through whose platform you made the reservation and accommodation partners may choose to communicate with you directly by email or other channels that Hotel Anfield does not control.

How does Hotel Anfield use mobile devices?

We offer a free version of our regular website that has been optimised for mobile and tablet browsing. This mobile website processes the personal details you give us in much the same way as our website does.

Hotel Anfield may make use of something known as cross-device tracking in order to optimise our services and marketing activities. This may be done with or without the use of cookies. With cross-device tracking, Hotel Anfield is able to track user behaviour across multiple devices. As part of cross-device tracking, Hotel Anfield may combine data collected from a particular browser or mobile device with another computer or device linked to the computer or device from which the data was collected.

Personalised advertisements shown to you on other websites can be offered based on your activities on linked computers and devices. By opting out of the NAI behavioural advertising program, you can opt out of cross-device tracking for advertisement purposes.

How does Hotel Anfield use social media?

Here at Hotel Anfield, we use social media in different ways. We use it partly to facilitate the use of online reservation services and to advertise, improve and facilitate our own services.

What security procedures does Hotel Anfield put in place to safeguard your personal data?

In accordance with European data protection laws, we observe reasonable procedures to prevent unauthorised access to, and the misuse of, personal data.

We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorised personnel are permitted to access personal data in the course of their work.



How does Hotel Anfield treat personal data about children?

The services offered by Hotel Anfield are not directed at children under 18 years old. The use of any of our services is only allowed with the valid consent of a parent or a guardian. If we receive information from a child under 18 years old, we reserve the right to delete it. In limited cases as part of a reservation, purchase of other travel-related services, or in exceptional other circumstances (such as features addressed to families), Hotel Anfield may collect and use information about children only with the consent of the parent.

How can you control the personal data you've given to Hotel Anfield?

You always have the right to review the personal information we keep about you. You can request an overview of your personal data by emailing us at the address stated below. Please write "Request personal information" in the subject line of your email to speed things up.

You can also contact us if you believe the personal information we have for you is incorrect, if you believe that we are no longer entitled to use your personal data, or if you have any other questions about how your personal information is used, or about this Privacy Statement. Please email or write to us using the contact details below. We'll handle your request in accordance with the applicable data protection law. You can delete your user account at any time by signing in to your account on the Hotel Anfield website and removing your account.

Who's responsible for processing personal data on the Hotel Anfield website?

Happy Days Hospitality Ltd (accommodation) & Happy Elsa Ltd (event space) control the processing of personal data on its website. Both companies are a private limited liability company, incorporated under the laws of England and has its offices at 14 Colquitt Street, Liverpool L1 4DE. Hotel Anfield is situated at 23 Anfield Road, Liverpool, L4 0TE. If you have any suggestions or comments about this privacy notice, please send an email to [stay@hotelanfield.com](mailto:stay@hotelanfield.com) and we'll get right back to you.