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# GUEST PRIVACY NOTICE

Dakota Hotels

*Last updated 17 April 2026*

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## INTRODUCTION

Dakota Hotels are operated by Dakota Hospitality Limited (“the Company”, “we”, “us”, or “our”). We are committed to protecting your privacy and handling your personal information responsibly and transparently.

This privacy notice explains how we collect, use, share, and protect your personal data. We are required to do so under the

This privacy notice explains how we collect, use, share, and protect your personal data. We are required to do so under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We want you to feel confident that your information is safe with us. While data protection law can be complex, our promise to you is straightforward:

- We will never sell your personal data.
  - We will only share your data with trusted third-party providers where necessary to deliver our services or comply with the law.
  - We will keep your data secure and confidential.
  - You will have clear rights over your data, including the right to access, correct, delete, or restrict its use where legally applicable.
  - You can opt out of marketing communications from us at any time.
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## HOW WE USE YOUR PERSONAL INFORMATION

We collect and process your personal data to provide and manage our services to you. This may include information you provide directly, or information shared with us by a third party on your behalf. We will only use your data where we have a lawful basis, such as:

1. Contractual necessity – to fulfil a contract we have with you (e.g. hotel bookings or event reservations).
2. Legal obligation – where we are required to process data to comply with the law.
3. Vital interests – in rare cases, to protect your life or someone else’s.
4. Legitimate interests – where the processing is necessary for our business operations or your interests, unless overridden by your data protection rights.
5. Consent – where you have given clear permission for us to use your data for a specific purpose (e.g. subscribing to marketing emails). You can withdraw your consent at any time.
6. To operate and improve our website and digital services – including understanding how our website is used, personalising your online experience, and delivering relevant content and advertising where you have consented to this. This may involve the collection of technical data such as your IP address and device information.

We will not disclose your personal data to any third party unless we have your permission, it is necessary for the purposes outlined above, or we are legally required to do so.

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## YOUR RIGHTS

Under data protection law, you have the right to:

- Request access to the personal data we hold about you (a Subject Access Request).  
The easiest way to do this is by completing the ICO's Subject Access Request form from here: <https://ico.org.uk/for-the-public/make-a-subject-access-request/>. In the form, please cite the following Company email address as: [GDPR@dakotahotels.co.uk](mailto:GDPR@dakotahotels.co.uk), our dedicated data protection contact address. You are not required to use the form and may submit a request in writing or verbally.
- Ask for incorrect or incomplete data to be corrected.
- Request deletion or restriction of your data where appropriate.
- Object to processing based on legitimate interests or direct marketing.
- Withdraw consent at any time, where processing is based on your consent.

To exercise your rights or for any questions about how we handle your personal data, please contact us in writing at [GDPR@dakotahotels.co.uk](mailto:GDPR@dakotahotels.co.uk).

You can also find further information on your rights from the Information Commissioner's Office (ICO) at <https://ico.org.uk>.

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## HOW YOUR INFORMATION WILL BE USED

We collect and process your personal data for specific purposes, in accordance with data protection legislation. This includes:

1. To verify your identity – helping us confirm bookings, manage accounts, or respond to enquiries securely.
2. To enhance your experience – allowing us to tailor services, communications, and offers to your preferences.
3. To provide you with relevant information – such as booking confirmations, event updates, or promotional offers (where consented).
4. To reserve, secure, and deliver services – including accommodation, dining, event reservations, and other hospitality services.
5. To take and manage payment – for the goods and services you purchase, and to maintain accurate billing records.

We only collect and process information that is necessary for these purposes and in line with a lawful basis under the UK General Data Protection Regulation (UK GDPR).

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## YOUR RIGHT TO COMPLAIN: COMPLAINTS PROCEDURE

If you have any concerns about how your personal data is handled, you can raise a data protection complaint with us by sending it to [GDPR@dakotahotels.co.uk](mailto:GDPR@dakotahotels.co.uk). We encourage you to contact us directly so that we can investigate and try to resolve the matter, but you are not required to do so before raising a concern with the Information Commissioner's Office.

When we receive a data protection complaint, we will:

- acknowledge receipt within 30 days;
- review the matter and make any necessary enquiries;
- keep you informed where appropriate; and
- provide a clear response explaining the outcome of our investigation without undue delay.

To help us deal with your complaint as efficiently as possible, it may be helpful to include details of your concern, the personal data involved, and any relevant dates or correspondence. Complaints do not need to follow a specific format.

You have the right to raise a complaint at any time with the UK's independent data protection authority:

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

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## LEGAL OBLIGATIONS: PASSPORT AND IDENTITY INFORMATION

As part of our legal obligations under the Immigration (Hotel Records) Order 1972, we are required to collect and retain specific personal information about our guests.

### What We Collect

We are required to collect the following information from all guests aged 16 and over:

- Full name
- Nationality
- Next destination (if known)

In addition, for guests who are not UK or Irish nationals, we are required to collect:

- Passport or identity document number
- Place of issue of the passport or ID
- Details of your next destination

This information may be verified against your identity document upon check-in. While we may view your passport or ID for verification, we will only retain a copy where necessary and lawful to do so.

### Why We Collect This Information

The lawful basis for this processing is compliance with a legal obligation under UK immigration law. This requirement supports the UK's border security and public safety framework.

### How Long We Keep It

In line with the law, we retain this information for a minimum of 12 months from the date of your arrival. These records must be made available for inspection by law enforcement authorities, such as the police, if requested.

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## SHARING YOUR INFORMATION

We may share your data with trusted third parties who support the delivery of our services (such as booking platforms, payment processors, or IT providers). This is always done securely and only where necessary for operational or legal reasons.

Please refer to the table below for a breakdown of the types of information we collect and the third parties with whom we may share it for processing purposes. This table is kept under review and may be updated as required.

Business Function	Purpose of Processing	Categories of Individuals	Categories of Personal Data	Categories of Third Party Recipients
Marketing	Direct marketing	Website Subscribers	Email address, preferences	Processor - marketing website; Cendyn CRM,

Business Function	Purpose of Processing	Categories of Individuals	Categories of Personal Data	Categories of Third Party Recipients
				T93FT, Google, Meta, Sevenrooms, Daylight, Avvio
Marketing	Bedroom bookings and direct marketing	Future, present and past subscribers	Contact details, history and preferences	WhatsApp, Shiji
Marketing	Loyalty program administration	Loyalty app members, Future, Present and Past Guests	Contact details, DOB, History & Preferences	Processor — Nonius
Marketing	Loyalty program direct marketing	Loyalty App members and database subscribers	Email address	Marketing website, Cendyn CRM
Marketing	Retargeting and price comparison	Website visitors	IP address, device data, browsing behavior	TripTease
— Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	Contact details - Name, email address and telephone number.	Processor — Daylight, ReviewPro and UpsellGuru
— Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Planet
— Shiji Enterprise Platform	All Bedroom Bookings	Future, Present and Past Guests	History & Preferences	Processor — Daylight
Website Bookings	Online Bedroom Booking	Future, Present and Past Guests	Contact Details	Processor - Allora.ai - AVVIO, SiteMinder, ReviewPro and UpsellGuru
Website Bookings	Online Bedroom Booking	Future, Present and Past Guests	Credit / Debit Card Details	Processor - Allora.ai - AVVIO, Global Payments and SiteMinder
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Credit / Debit Card Details	Processor — Global Payments, SiteMinder, Navarino and third-party website the guest booked through themselves including but not limited to Booking.com, Trip Advisor, Trip.com and Expedia.
Website Bookings	Bedroom Bookings made through third party websites	Future, Present and Past Guests	Contact Details	Processor — SiteMinder, Navarino, ReviewPro, UpsellGuru and third-party website the guest booked through themselves including but not limited to Booking.com, Trip Advisor, Trip.com and Expedia.
Credit Card Terminal	Credit / Debit Card Payments	All paying customers	Credit / Debit Card Details	Processor - Planet
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, requests and dietary notes, accessibility requirements	Processor - Sevenrooms
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	Contact details, Credit / Debit Card Details	Processor — Stripe

Business Function	Purpose of Processing	Categories of Individuals	Categories of Personal Data	Categories of Third Party Recipients
Bar & Grill Bookings	Restaurant and Bar table Booking	Future, Present and Past Guests	History & Preferences	Processor - Sevenrooms
CCTV	Safety and Security	All persons on hotel property	Photographic Image	Police; HMRC; Food Alert (H&S Consultants);
Health and Safety	External advice, Legal Obligation	Future, Present and Past Guests	Contact Details, descriptions of Health & Safety incident including accident or alleged food poisoning.	Health and Safety Executive, Food Alert (H&S Consultants); AON Insurance Brokers and related insurance companies
Gift Vouchers	Voucher Sales and Delivery	Gift Voucher Customers and Recipients	Contact details (Purchaser and Recipient)	SK Chase, Avvio
Revenue/Marketing	Collecting Guest Feedback	Future, Present and Past Guests	Contact Details	Processor - Review Pro
Vehicle Number plates — Dakota Eurocentral Edinburgh and only	Car park security and authority	All persons on property or entering car park with a vehicle.	Vehicle registration plates	Processor — Parking Eye
Recruitment	Applications to job vacancies	Job applicant	Contact Details, CV	Recruit Genie

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## DATA PROCESSING

We may process personal data through Microsoft 365 applications, including but not limited to Outlook email and SharePoint, as part of the Company's standard business operations. The Company has appointed Astro Communications Ltd to act as an extension of its IT department and uses Darktrace Holdings Ltd as its cybersecurity. In addition, some employees may use the Company's licensed Claude AI tool on their devices to support workflow efficiency; while this tool may process data as part of those tasks, it does not use personal data for model training, and it is not used to make any automated decisions regarding you or your reservations with the Company.

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## HOW LONG YOUR DATA IS KEPT

1. Direct and website hotel bookings: Your contact details, stay and event history, preferences, payment card details, allergy and dietary information, accessibility requirements, guest feedback and any other personal data collected in connection with your booking are retained for 7 years to align with our financial and legal obligations, and to help us improve and personalise your future reservations. Payment card details are handled securely and processed by the specified payment processor.
2. Third-party hotel bookings: Where you book through a third-party website such as Booking.com or Expedia, your contact details and payment card details are retained in line with that provider's own retention policy, which may be up to 10 years. We retain your details on our own systems for the same purpose and period as direct bookings above.
3. Marketing communications: If you have opted in to receive marketing from us, we retain your email address, contact details, preferences, stay history, date of birth, IP address, device data and browsing behaviour until you unsubscribe or ask us to remove you. You can do this at any time by contacting us or using the unsubscribe link in any marketing email.
4. Restaurant and bar bookings: Your contact details, dining history, preferences, special requests, payment card details, allergy and dietary information, accessibility requirements, guest feedback and any other personal data collected in connection with your reservation are retained for up to 3 years from the date of your booking. Payment card details are handled securely and processed by the specified payment processor.

5. Guest feedback and reviews: Where you respond to a guest satisfaction survey, submit a review, or contact us via guest communications channels, your details are retained for up to 3 years. This data is processed by the following providers:
  6. Gift vouchers: Your contact details are retained for 36 months after the end of the voucher lifecycle (i.e. once the voucher has been redeemed, expired, cancelled or refunded). After this point your personal details are removed, with only non-personal voucher information retained.
  7. Loyalty programme: If you are a member of our loyalty programme, your contact details, date of birth and stay history are retained for as long as your membership remains active, or until you ask us to close your account.
  8. Car parking: This applies to Dakota Edinburgh and Dakota Eurocentral only, where car park management is operated by ParkingEye. Vehicle registration plates are retained for the period specified at the time of entry. Where a registration is held on an indefinite basis, it will be retained until at least December 2030, at which point the first periodic review will take place. You may request removal of your registration at any time prior to this.
  9. CCTV: CCTV footage recorded on our premises is retained for up to 90 days.
  10. Health and safety records: Records of health and safety incidents, including accidents or alleged food safety concerns, are retained for up to 10 years as required by law and our insurance obligations.
  11. Job applications: If you apply for a role with us, information you provide for your application including your CV and contact details are retained for up to 3 years after your application, unless you ask us to remove them sooner.
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## INTERNATIONAL DATA TRANSFERS

We do not transfer your personal data outside the United Kingdom. Some of our third-party service providers are based outside the UK and may process your data on servers located in other countries; where this is the case, we ensure appropriate safeguards are in place in accordance with UK data protection law.

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