

# PRIVACY POLICY

## 1. Introduction

The protection and the correct collection, processing and use of your personal data is of great importance to Accor UK Business & Leisure Hotels Limited (“**AccorInvest**” or “**we**”) as the owner of the Novotel London Canary Wharf Hotel (“**Hotel**”) and the data controller of your personal data as defined in the applicable data protection legislation, including the UK General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018. We want you to feel that your personal data is safe with us. For AccorInvest, the protection of personal data is a high-priority, group-wide topic and we work with partners who have the same attitude as us.

## 2. Application of this privacy policy

This privacy policy applies to personal data we collect either directly from you when you share it with the Hotel’s restaurant and bar (“**Venue**”) by phone, in person or online through the website [bokanlondon.co.uk](http://bokanlondon.co.uk) (the “**Website**”) or through our partners.

In this privacy policy we explain how we will use your personal data. Please contact us on [GDPR\\_UK@accorinvest.com](mailto:GDPR_UK@accorinvest.com) should you have any questions.

This privacy policy does not apply to third party websites that you may be able to access via links, third party apps, tools, widgets or plug-ins on the Website, for example the Fork (formerly Bookatable) website or reservation widget or our Instagram page. We are not responsible for the policies and practices of these third parties. Any information you give to those organisations is dealt with under their own privacy statement, terms and conditions and other policies so please ensure that you review them.

## 3. What personal data do we collect?

We may collect personal data about you and, to the extent that you or they provide us with such information, the persons accompanying you, which we have grouped together as follows:

- Identity Data (first name, surname, title, date of birth)
- Contact Data (telephone number, email address)
- Financial Data (your payment card details)
- Transaction Data (for example, details about reservations you have made with the Venue, your membership number for Accor SA’s loyalty program and information related to your activities within the context of that loyalty program, your questions/comments, information about special occasions)
- Special Category Data (where you provide us with details of allergies or other dietary requirements)
- Technical Data (for example, internet protocol (IP) address, browser type and version, time zone setting and location and other technology on the devices you use to access this Website)

In order to meet your requirements or provide you with a specific service (such as dietary requirements), we may have to collect Special Category Data, such as information concerning race, ethnicity, or details of health. In this case, we will only process this personal data if you provide your explicit prior consent.

We might also need to share data concerning your health with third parties (hospitals, doctors) in case of emergency medical care (i.e allergic reaction).

## 4. For which purposes do we collect your personal data?

We collect and use your personal data only to the extent necessary in order to book a table at the Venue (including the roof terrace) and to enable us to provide associated services.

Purpose/activity	Type of personal data	Legal basis for processing
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Use of Website	Technical Data	Legitimate interest (Art.6.1(f) UK GDPR)
To record and manage your reservation	Identity Data Contact Data	Performance of a contract (Art. 6.1(b) UK GDPR) Legitimate interest (Art.6.1(f) UK GDPR)
To ensure we adhere to your allergies and any dietary requirements or access requirements	Identity Data Contact Data Special Category Data	Performance of a contract (Art. 6.1(b) UK GDPR) Consent (Art.6.1(a) UK GDPR) Vital interests (Art.6.a(d) UK GDPR)
To process any payments you make	Identity Data Financial Data	Performance of a contract (Art. 6.1(b) UK GDPR)
To manage our relationship with you, including notifying you about information relevant to your reservation with us, dealing with enquiries, correspondence, concerns or complaints and recovering any debts from you	Identity Data Contact Data	Performance of a contract (Art. 6.1(b) UK GDPR) Legitimate interest (Art.6.1(f) UK GDPR)

## **5. How long do we keep your personal data?**

We will store your personal data for as long as necessary to carry out the purposes outlined in this privacy policy and for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, you can ask us to delete your personal data: see below for further information.

## **6. How is my personal data shared with third parties?**

We may have to share your personal data with the third parties set out below for the purposes set out in the table in paragraph 4 above:

- Other companies within the Accorinvest Group, for example where processing functions are centralised within our Group.
- Service providers and business partners, including The Fork (formerly Bookatable) where this is necessary to provide a service to you.
- Professional advisers, including lawyers or auditors, where this is necessary in connection with a service they provide to us.
- HM Revenue & Customs and other relevant authorities, where this is required by law or as part of an inquiry. We will ensure that any such transfer is carried out in accordance with the data protection legislation.
- With an entity to whom we sell, transfer or merge parts of our business or our assets.

## **7. Booking through third party tools hosted on the Website**

When you book through any third party reservation platform, whether via a tool hosted on the Website or directly with that platform, you are sharing your personal data directly with those third parties for the purposes of making the booking. They will share the relevant personal data with us in order for us to secure your reservation according to their privacy policy. The Fork's privacy policy is available at <https://www.thefork.com/legal#PrivacyPolicy>.

## **8. Data Security**

AccorInvest takes appropriate technical and organizational measures, in accordance with applicable legal provisions (in particular: Art. 32 UK GDPR), to protect your personal data against illicit or accidental destruction, alteration, loss, misuse and unauthorized access, modification or disclosure. To this end, we have taken technical measures (such as firewalls) and organizational measures (such as a user ID/password system, means of physical protection etc.) to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

## **9. Cookies**

AccorInvest uses cookies on the Website. To learn more about how AccorInvest uses cookies and how you can configure them, please consult our [Cookies Policy](#).

## **10. Your Rights**

If you have concerns or questions about how we process your personal data, or would otherwise like to exercise your rights:

- to withdraw your consent at any time;
- to make a subject access request for a copy of your personal data;
- to request that we correct your personal data if they are inaccurate or out of date;
- to request that we erase your personal data;
- to request that a restriction is placed on the processing of your personal data;
- to request that we provide you with a copy of your personal data that you originally supplied to us, and where possible transmit that data directly to another data controller; and
- to object to the processing of your personal data,

please contact us by email to [GDPR\\_UK@accorinvest.com](mailto:GDPR_UK@accorinvest.com) or by writing to us at the below address:

Data Privacy Team  
AccorInvest  
10 Hammersmith Grove  
London W6 7AP

## **11. DPO details**

The contact details of our outsourced UK Data Protection Officer are the following:

Trilateral Research UK,

Phone: +44 (0) 2070528285

Email: [GDPR\\_UK@accorinvest.com](mailto:GDPR_UK@accorinvest.com)

Address: One Knightsbridge Green (5th Floor)  
London SW1X 7QA

For the purposes of confidentiality and personal data protection, we (or Trilateral Research Ltd) may need to check your identity in order to respond to your request. In case of reasonable doubts concerning your identity, you may be asked to include a copy of an official piece of identification, such as an ID card or passport, along with your request. A black and white copy of the relevant page of your identity document is sufficient.

All requests will receive a response as swiftly as possible.

If you have a complaint about our use of your personal data, you can contact the Information Commissioner's Office via their website at <https://ico.org.uk/make-a-complaint/> or write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## **12. Updates**

This privacy policy was last updated on 24 November 2022. We may modify this policy from time to time. Consequently, we recommend that you consult it regularly.