



## **Privacy Notice**

Bed Reservations (Jersey) Limited and Bed Reservations (Alpha) Limited together trading as and referred to as 'Bed Reservations', 'the Company' 'we' or 'our' are committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us pursuant to the Data Protection (Jersey) law 2018 ("DPJL").

Bed Reservations is a "Data Controller", which means we are responsible for deciding how we hold and use personal information. We are also registered with the Jersey Office of the Information Commissioner ("JOIC") –

Bed Reservations (Jersey) Limited – JOIC no 102581

Bed Reservations (Alpha) Limited – JOIC no 102582

We will comply with data protection law, the principles of which says that the personal information we hold about you must be: -

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept your data only as long as necessary for the purposes we collected it.
- Kept securely.

Bed Reservations is accountable to you and the Authorities to show compliance with ("DPJL") and demonstrate how we are compliant.

### **The Data Protection Officer ("DPO")**

We have appointed a DPO to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or how we handle your personal

information, contact the DPO at [dataprotection@bedreservationsjersey.je](mailto:dataprotection@bedreservationsjersey.je)

You have the right to make a complaint at any time to the JOIC.

Contact details for these are outlined at the bottom of this Privacy Notice.

## **The Kind of Information We Hold About You**

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Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

To explain this to you, we will list our different services when we collect or use additional information about you.

## **How Is Your Personal Information Collected?**

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We collect personal information about you when you contact us, engage us to provide a service or provide use with your data for another specific purpose.

What information do we collect about you?

- Name
- Title
- Address
- Date of birth
- Nationality
- Telephone number
- Email address
- Date of arrival and departure
- Payment details
- Identification documents

What Special Category Data do we collect about you?

Bed Reservations do not collect Special Category data from clients unless it forms part of your reservation booking work and you volunteer this information. If that is the case, we will explain our legal basis for processing your data and your rights to withdraw consent, if that is the legal basis used at the time.

## **How We Will Use Information About You?**

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We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- You have entered a **Contract** with us to provide you with a service; an example of this would be when you have engaged Bed Reservations to work on a specific project for you.
- We need to comply with a **Legal Obligation**; an example of this would be when we have to comply with lawful authority to disclose information to the Planning Department or make plan public for comment.
- Where it is necessary for our **Legitimate Interests** (or those of a third party), your

interests and fundamental rights do not override those interests. An example of this is when we make contact with local residents to inform them of ongoing work in the area.

We may also use your personal information in the following situations, which are likely to be rare:

- Where you have given, you **consent** to contact you for a specific purpose, such as to receive marketing material about Bed Reservations services.

## Change of purpose

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We will only use your personal information for the purposes we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

## Data Sharing

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We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, we may disclose your Personal Information to meet legal obligations, regulations, or valid governmental requests.

We use certain third parties also known as Processors to provide or support our services. We have appropriate agreements in place with those processors to ensure the safety of your information. For information on these processors please see the table below. We do not share your information with any processors for the purposes of direct marketing.

The current data processors used by Bed Reservations are.

Processor	Description of processing	Link to Privacy Notice
<b>Propelfwd</b>	Data Protection Managers. They provide advice and assistance with our data protection requirements and have no access to your data. They will only if you put in a data rights request or if we have a data incident/breach.	<a href="#">Privacy Notice - Propelfwd</a>
<b>YourDataSafe</b>	Data governance platform used to store and manage all required logs, registers, ROPA, DPIAs etc.	<a href="#">YourDataSafe</a>
<b>Back You</b>	This is a booking platform used to take bookings for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Backyou Privacy Policy</a>

<b>BookBoost</b>	This is a booking platform used to take bookings for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Bookboost Privacy Policy</a>
<b>Ezzybill</b>	Financial book-keeping software used to issue invoice and manage our accounts	<a href="#">Ezzybills Privacy Policy</a>
<b>Xero</b>	Xero accounting platform that processes financial data, automates bookkeeping, manages invoices, bank reconciliation.	<a href="#">Privacy Notice   Xero</a>
<b>Approvalmax</b>	Financial book-keeping software where our invoices are stored	<a href="#">ApprovalMax Privacy Policy</a>
<b>Mews</b>	This is a booking platform used to take booking s for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Mews Privacy Policy</a>
<b>Booking.com</b>	This is a booking platform used to take booking s for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Booking.com: Privacy &amp; Cookie Statement.</a>
<b>Expedia</b>	This is a booking platform used to take booking s for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Privacy statement</a>
<b>Hostel World</b>	This is a booking platform used to take booking s for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Hostelworld Privacy Policy</a>
<b>Trip.com</b>	This is a booking platform used to take booking s for hostels in the UK and Amsterdam. We have access to the personal data of data subjects who book our rooms.	<a href="#">Trip.com's Privacy Policy</a>

Processors are other organisations/services carefully chosen by Bed Reservations to process your information correctly and securely. In the case of organisations outside of Jersey, the United Kingdom and the European Economic Area (EEA);

(a) we have prior written instructions for the transfer or

(b) we have entered into specific contractual terms with them to ensure that they treat your personal data in a way equivalent to that in which they would be required if they were established in Jersey.

We use Microsoft Azure and SharePoint to process and store our data. We have selected EEA storage locations for our data, so London, UK is our preferred data storage location with Microsoft.

We ensure that your privacy rights are respected in line with this Notice and the same protection is given to your personal data as laid down by the DPJL.

## **Data Security**

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We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Staff, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions, and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our DPO.

We have put in place procedures to deal with any suspected data security breach and notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Data Retention**

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We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy 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 data. The purposes for which we process your data and whether we can achieve those purposes through other means and the applicable legal requirements.

You can request our Data Retention Schedule from our DPO if required.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **Rights of Access, Correction, Erasure, and Restriction**

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The personal information we hold about you must be accurate and current. Please keep us

informed if your information changes during your relationship with us.

Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This right enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This right enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal information. This right enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** your personal information where we rely on a legitimate interest (or those of a third party). There is something about your particular situation that makes you want to object to processing on this ground. You also have the right to object to processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This right enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request the erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, contact our DPO at [dataprotection@bedreservationsjersey.je](mailto:dataprotection@bedreservationsjersey.je)

You will not have to pay a fee to access your personal information (or exercise any other rights). However, we may charge a reasonable fee if your access request is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **How to request your information and what we may need from you**

You can use the Data Subject Access Request form, available **on our Cookie Banner** or [click here](#) to access our data rights request portal. If you have any questions about this process or any of your rights, contact our DPO at [dataprotection@bedreservationsjersey.je](mailto:dataprotection@bedreservationsjersey.je)

You can also email in your request, make your request over the telephone verbally to one of our team, whatever way you feel more comfortable with.

We will need to request specific information from you to help us confirm your identity and ensure your right to access the information (or exercise any of your other rights).

We will respond to your request without undue delay, but certainly within **Four Weeks** after satisfactory verification of your identity. In some circumstances we can apply an eight-week extension to this time frame if the request is complex in nature, and it cannot be answered in the four-week time frame. If this is to happen, we will inform you as soon as possible.

### **Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection,

processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, contact our DPO at [dataprotection@bedreservationsjersey.je](mailto:dataprotection@bedreservationsjersey.je)

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

### **Changes to this Privacy Notice**

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We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or requesting you to confirm the accuracy of the information we hold on you.

### **Complaints**

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We want the chance to resolve any complaints you have about how we process your information. You have the right to complain to the JOIC about how we have used your data.

The details for each of these contacts are:

#### **Bed Reservations**

First Floor, 6 Vine Street, St Helier, Jersey JE2 4WB

Telephone + 44 (0) 1534 735330 Email: [dataprotection@bedreservationsjersey.je](mailto:dataprotection@bedreservationsjersey.je)

#### **Jersey Office of the Information Commissioner**

2<sup>nd</sup> Floor, 5 Castle Street, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or email [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)