

ARTICLE 13 PRIVACY NOTICE

Data Protection Act 2018/General Data Protection Regulations UK (GDPR UK)

THE LANDING HOTEL WIFI PRIVACY NOTICE

The Landing Hotel is collecting your personal data. As a Data Controller when we collect personal data, we are obliged legally to provide clear and transparent information about our processing activities. That information is contained within this privacy notice.

The wifi at the Landing Hotel is for use by anyone on the site. This includes but it not limited to visitors, passengers, airport employees, contractors.

The Landing Hotel use a Wi-Fi service provided by Ormit Solutions Ltd T/A Splash Access via an end-user Splash portal. Splash Access will be acting as a Data Processor.

Splash Access privacy notice can we viewed here [Privacy Policy - Splash Access Cisco Meraki](#)

THE LANDING BIGGIN HILL CONTACT DETAILS:-

The Landing Hotel
Churchill Way
Main Road
Biggin Hill
Bromley
TN16 3BH
enquiries@thelandinghotel.co.uk
Tel No 01959 578576
www.thelandinghotel.co.uk

THE PERSONAL INFORMATION THAT WE COLLECT

We currently collect and process the following information:-

- Title
- Forename
- Surname
- E-mail address
- Age bracket
- Reason for visit (ie business or leisure)

HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT

When you provide your personal data to access WIFI at our venue, we will use this data for the performance of a contract as described in the terms and conditions of service when you agree to access the wifi.

If you have ticked the opt in box on the guest wifi login page The Landing Hotel will send you electronic marketing information via your e-mail address. By ticking the opt-in box you are providing The Landing Hotel with your consent under Article 6 of the UK GDPR and the Privacy & Electronic Communications (EC Direction) Regulations 2003.

Under the General data Protection Regulation UK (GDPR), the lawful basis we rely on for processing this information is:-

- Consent

You can withdraw your consent for us to send you marketing by e-mail at any time by clicking on the unsubscribe link at the bottom of any marketing e-mails we send you.

If you have provided your consent on the wi-fi login page. This data will be obtained by The Landing Hotel by exporting the data and entering a password to access the downloaded data.

A copy of our privacy notice for marketing purposes can be viewed at [Privacy Policy - The Landing](#)

HOW YOUR PERSONAL INFORMATION IS STORED

Splash Access will store your data on dedicated hosted servers located in the UK.

Downloaded data for the purpose of marketing will be stored within the hotels MS365 tenant in UK based data centres.

SECURITY OF YOUR PERSONAL DATA

All data is stored in the UK. Splash access servers sit behind a managed firewall. Data stored is encrypted.

RETENTION OF YOUR PERSONAL DATA

If you use our Wifi services and you do not login to one of Splash Access's Wifi venues for more than 24 months, all personally identifiable data that is stored by Splash Access will be deleted.

The Landing Hotel will continue to send you marketing until you withdraw your consent.

YOUR DATA SUBJECT RIGHTS

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email datamanager@bigginhillairport.com or use the information supplied in the 'Contact Us', section below.

Please see below a full list of data subject rights below but please remember that depending on the lawful basis for processing they may not be absolute rights. If you require further information, please do not hesitate to contact us.

THE RIGHT TO BE INFORMED

As a data controller when we collect personal data we are obliged legally to provide clear and transparent information about our processing activities. That information is contained within this privacy notice.

THE RIGHT OF ACCESS

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to exceed one calendar month, where we require additional time or (extended by 2 calendar months), or, in the case of repetitive requests, we reserve the right to request payment (for reasonable administrative costs) before processing the request, we will inform you.'

THE RIGHT TO RECTIFICATION

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

THE RIGHT TO ERASURE ('THE RIGHT TO BE FORGOTTEN')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

Due to the complex nature of Consent and legal exemption, we are not always able to fulfil deletion ("Right to be Forgotten") requests, and it is essential you understand this before accessing the service.

THE RIGHT TO RESTRICT PROCESSING

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of personal data is contested.
- b) Processing of personal data is unlawful.
- c) We no longer need personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised, and processing is restricted pending a decision on the status of the processing.

THE RIGHT TO DATA PORTABILITY

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of Consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

THE RIGHT TO OBJECT

You have the right to object to our processing of your data where;

- a) Processing is based on legitimate interest;
- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at:-

datamanager@bigginhillairport.com
01959 578517

Alternatively, please contact The Landing Hotel directly details on page 1 of this privacy notice.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's contact details are as follows:-
Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Livechat via ico.org.uk/livechat
Helpline number: 0303 123 1113
ICO website: www.ico.org.uk