

Hotelsystems.co.uk T/A TJC Systems Limited

Data Privacy Policy

Rev. 1.0 May 2018

Introduction

This document lays out the forms of data gathered and handled by Hotelsystems.co.uk T/A TJC Systems Limited [hereafter referred to as 'The Company'] in the course of the management and providing of 'Hotel Booking System', and 'Online Booking System'.

Within this document, you will find a breakdown of what data is stored, the methods of gathering and storing said data, and the security policies implemented in line with the rights of the data controller and the data subject, as outlined in the Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR) 2018.

Please note the version number, as printed on the first page of this document. *The Company r*eserves the right to update this policy, without notice to users, at any time. Any alterations to the policy will be noted in the version number, and the most recent version can be found on <u>www.hotelsystems.co.uk</u>

Authorised Person/s

The Authorised person for *The Company* is currently Tristan Collings. This person may access both user data, and guest data (See <u>Types of Data Stored</u>) for the reasons outlined in <u>Data Access</u>.

The Company reserves the right to appoint further individuals, should the need arise, and allow access to data under the circumstances outlined in <u>Data Access</u>.

Types of Data Stored

User Data

To operate as a business, *The Company* is required to store information ascertaining to the individuals and organisations who hold software licences. This data is securely stored (<u>See Data storage security measures</u>) and accessed by the companies authorised person person (See <u>Authorised Person/s</u>) to maintain the service, and contract renewals.

User Data Stored may include, but is not limited to:

- User ID
- Company Name
- Contact Name
- Company Address
- Email Address
- Contact Number

Guest Data

The Company offer two software products (Hotel Booking System and Online Booking System). The data for each software is stored in different means, as noted below.

Hotel Booking System:

Hotel Booking System is a client side software product, run on Windows Architecture. The data entered on this software is stored entirely on the client machine. Unless modified, the software will never store it's data on additional machines, or off site back ups. For these reasons, *The Company* hold no liability over the security of the data and/ or it's security measures.

Data Security Measures for EU citizens data are outlined in GDPR, and further guidance can be found via ico.org.uk

Online Booking System:

Online Booking System is provided as a fully hosted, web based product. *Online Booking System* integrates directly with *Hotel Booking System*, allowing guests to make appointments via *Online Booking System*. This data is stored with DiscountASP.net as well as on the client machine.

Data Access

For the purpose of processing, *The Company* will access their internal records of software users (see <u>Types of Data Stored</u>), without the requirement to gain permission from, or notify the software users.

Hotel Guest data would not ordinarily be accessed by *The Company,* unless otherwise instructed to, or requested by the customer for the purpose of additional data processing, or support.

Legitimate Interest

The data is stored by *The Company* (see <u>Types of Data Stored</u>), as outlined in GDPR Chapter 2, Article 6 (Lawfulness of processing) for the following reason:

'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.'

Data Storage Security Measures

Software User Data is stored locally on an encrypted Windows Machine, and can only be accessed by The Companies designated person.

Guest Data (in cases where a user has opted to install the Online Booking system software) is stored both on the client machine, and on servers rented by *The Company*. All connections made to hotel Booking system are encrypted via 256bit SSL encryption.

Any Password data stored is hashed to hide the true value.

The online data is securely stored on UK based servers, hosted by DiscountASP.net thus meeting the GDPR standards for storage of EU citizens data.

You can find out more about DiscountASP.net's security measures Here

Deletion Policy

As the data stored by The Company (both user and guest data) is required to offer the software products, this data would not normally be modified or destroyed by the Company, unless requested by the user.

If a User ceases their contract with *Online Booking System,* guest data will be securely destroyed from the live server within a timely manner, or within 48 hours, if requested.

If a User ceases all contracts with *The Company*, Their data will also be securely removed from records in a timely manner – or within 48 hours if requested.