

Aimbridge EMEA Guest Privacy Notice

Last updated: 17 November 2025

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We recommend that you read this Privacy Notice in full to ensure you are completely informed about your personal data. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link above to jump to that section.

Aimbridge Hospitality EMEA ("**Aimbridge**", "**we**" or "**us**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal data about guests staying at hotels, using leisure clubs or facilities, such as restaurants, destination food and beverage areas or events centres managed by us ("**guest**", "**you**"), and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

As used throughout this policy, "Aimbridge" refers to Aimbridge Hospitality EMEA, and any hotel, meeting facility, food and beverage facility and leisure club managed by Aimbridge.

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details under the "[How to contact us](#)" heading below.

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1. What does Aimbridge do?

Aimbridge offers a complete suite of hotel management services via a team of hospitality professionals, providing hotel owners and developers with advice and services to operate their hotels. Aimbridge primarily operates as a third-party hotel management company and is not typically the owner of the hotel properties it manages. It may occasionally act as a lessee, assuming operational control of the hotel under lease agreements. Hotels under management may also carry a franchised hospitality brand, for example Hilton Hotels & Resorts, Accor etc. A full list of our brands can be found here: [View Our Portfolio of Hotel Operations - Aimbridge Hospitality EMEA](#)

For more information about Aimbridge, please see the “About” section of our Website at <https://aimbridgeemea.com/about/>.

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2. Personal data we collect and process

a) The personal data we collect from you, either directly or indirectly, will depend on how you interact with us and our services. We collect personal data about you from the following different sources:

- **Information that you provide directly**

We collect personal data directly from you when you choose to provide us with this information online (such as via a form or through the use of live-chat or chatbot features on an Aimbridge or Aimbridge managed website), in person and through your other interactions with us (such as data collected via social media and any surveys, customer service communications, competitions or other promotional programmes in which you may participate). Certain parts of our reservations process ask you to provide personal data when you engage with the following services: account creation and management, reservation of rooms, restaurant tables or other leisure facilities, customer service information and membership management.

- **Information that we collect indirectly**

We collect your personal data indirectly, including through automated means from your device when you use our online services or in one of our properties (via CCTV cameras). Some of the information we collect indirectly is captured using cookies and other tracking technologies, as explained further in the "[Cookies and similar tracking technology](#)" section below.

- **Information from third parties**

We also collect your personal data from third party sources, such as travel or other third party agents, hospitality brands we operate with, your travel companion or your employer who has made a booking on your behalf.

- b) The table below describes the categories of personal data we collect from and about you as well as the source of that information.

| Guest category | Personal Data Description | Source |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Your Identity Data such as your name, nationality, gender, date of birth and employer (if applicable). | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Conference or event guest | Your Contact Data such as your email address, home address and phone number. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest | Identity and Contact Data of your travel companion(s) such as their name, email address, nationality, date of birth, telephone number and home address. (Please see comment about minors below.) | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest | Passport Data if required for your registration. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest | Your Arrival and Departure dates and times | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Conference or event guest | Corporate travel planner information / travel agent information – as provided for corporate reservations or for reservations made through travel agents. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member | Your Preferences and Interests (for example, language preferences, | <ul style="list-style-type: none"> • Directly from you • Third parties |

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| <ul style="list-style-type: none"> • Conference or event Guest | smoking or non-smoking room, preferred floor, type of bedding). | |
| <ul style="list-style-type: none"> • Hotel guest • Conference or event guest • Restaurant guest | Your Review / Feedback / Queries raised during or following a stay in one of our hotels. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest | Account Data such as your hotel loyalty card number, and profile information (contact details including your name, surname, postcode, phone). | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest | Financial and Transaction Data such as truncated credit or debit card details, payment method, transaction statements, your billing address, payments, direct debit details, and membership and/or reservation details. | <ul style="list-style-type: none"> • Directly from you • Indirectly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest • | Vehicle Information if you are using a car park at one of our locations. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Leisure club member | Photograph of you if required for your membership pass or to verify your identity. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Health Data as and when required for any disability accommodations, allergy awareness, health emergencies, pandemics, gym and/or spa disclosures or if used to track your fitness progress. | <ul style="list-style-type: none"> • Directly from you • Third parties |

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| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest | Reservation details – for room bookings, restaurant reservations, gym classes, spa treatments. Data will include the date, time, service, location, and number of people you are making the reservation for. | <ul style="list-style-type: none"> • Directly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Restaurant guest • Conference or event guest • | Trade union membership details where a booking is made on behalf of you by your trade union. | <ul style="list-style-type: none"> • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Restaurant guest • Conference or event guest | Dietary details including allergy and preference information as and when required for accommodating restaurant reservations, conferences, weddings and other events. | <ul style="list-style-type: none"> • Directly from you |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest | Social Media such as social media handle. | <ul style="list-style-type: none"> • Indirectly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Communications Data such as your feedback on our services and other communications with us (including when you interact with our customer service agents offline), any queries you raise, competition and survey entries, chat, chatbot, email or call history with our customer services team or with third party service providers. This will include information as to how you contact customer services and the channel of communication that you use or any information that you send to us. | <ul style="list-style-type: none"> • Directly from you • Indirectly from you • Third parties |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest • | Advertising and Marketing Data such as your interests based on your use of our services and website, and other websites and online services, your bookings, survey responses, promotions you enter, participation in loyalty programs, preferences in | <ul style="list-style-type: none"> • Directly from you • Indirectly from you • Third parties |

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| | relation to receiving marketing materials from us, communication preferences, your preferences for particular services and your subscription details. | |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | CCTV Data collected in public or common areas in our premises and near our premises (such as in car parking areas and in which case footage may include vehicle licence plates) to prevent theft and fraud and more generally to protect our property and assets, employees, customers, vendors and visitors. | <ul style="list-style-type: none"> • Automatic collection • Third parties (where used for CCTV, security and access systems) |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Device Data collected from (or as a result of your using) your device (including by means of cookies and similar tracking technology), including your IP address, your ISP, the browser you use to visit our website, device type, broad-geographic location (e.g. country or city-level location), unique device identification numbers or other identifiers. | <ul style="list-style-type: none"> • Indirectly from you |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Usage Data such as activity and Aimbridge website interaction, information that we capture using cookies and similar technologies (see the " Cookies and similar tracking technology " section below). This will include page views and searches, log-in information, clicks, operating system, information about content viewed, watched or downloaded for offline access, length of visits to certain pages, length of Aimbridge website use, purchase history and other functional information on Aimbridge website performance (for example, application | <ul style="list-style-type: none"> • Indirectly from you |

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| | version information, diagnostics, and crash logs). | |
| <ul style="list-style-type: none"> • Hotel guest • Leisure club member • Restaurant guest • Conference or event guest | Location Data collected using Wi-Fi access points / and/or GPS from which we can identify your precise geographic location, e.g., technical information that associates your location to your use of our online services such as to provide you with the information about deals near your actual location. Location Data is also provided through your hotel room allocation or by signing into one of our leisure clubs or other facilities. | <ul style="list-style-type: none"> • Indirectly from you |

We only collect personal data about individuals under the age of 18 that is strictly necessary to fulfil a hotel booking and ensure a safe and comfortable stay. This may include the child's name, nationality, and date of birth. Such information must be provided by a parent or legal guardian. To help ensure the safety and security of all our guests, including minors, our premises are monitored by CCTV in public areas. This footage is collected and processed in accordance with applicable data protection laws and solely for security purposes.

If we need to collect any additional personal data during your stay, we will inform you at the time, explain the purpose, and let you know whether providing that information is mandatory or optional.

Some of the personal data that you provide may include sensitive personal data, such as health-related information, which is detailed above.

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3. How we use your personal data (our purposes) and our legal basis for processing it

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data in order to provide the goods and support the services you purchase or request from us;
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate interests** – we will use or disclose your personal data for the legitimate interests of either Aimbridge or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business; communicate with you and respond to your questions; improve our online services or use the insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors and visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms.
- **Legal obligation** – there may be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.
- **Vital interests** – there may be circumstances where we must use your personal data with regards to your health for emergency medical care but you are unconscious or unable to give consent to such processing.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.

| Purpose/Activity | Type of personal data | Lawful basis for processing including basis of legitimate interest |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Your account Register your account, to manage and administer your account. | Identity Data Contact Data Account Data Preferences and Interests Communication Data Device Data | <ul style="list-style-type: none"> • Performance of a contract with you. • Consent (in the case of processing of Location Data). |

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| | Location Data | |
| Reservations and bookings Facilitate reservations and bookings you make (including leisure club membership as applicable), including providing discounts and managing online loyalty programmes, and to manage cancellations. | Identity Data Contact Data Travel Companion Data (<i>as applicable</i>) Passport Data (<i>as applicable</i>) Arrival and departure dates and times (<i>as applicable</i>) Preferences and interests Corporate travel planner information / travel agent information (<i>as applicable</i>) Financial / Transaction Data Vehicle Information (<i>as applicable</i>) Photograph (<i>as applicable</i>) Health Data (<i>as applicable</i>) Reservation details (<i>as applicable</i>) Dietary details (<i>as applicable</i>) Account Data Communication Data Location Data | <ul style="list-style-type: none"> • Performance of a contract with you. • Legitimate interest. • Consent (in the case of processing of Location Data). • Legal obligation <p>In relation to Health Data: with your consent.</p> |
| Deliver services Provide and deliver services for hotel guests, leisure club members, and restaurant and other facility users. | Identity Data Contact Data Travel Companion Data (<i>as applicable</i>) Passport Data (<i>as applicable</i>) Arrival and departure dates and times (<i>as applicable</i>) Preferences and interests | <ul style="list-style-type: none"> • Performance of a contract with you. • Legitimate interest. • Consent (in the case of processing of Location Data). • Legal obligations |

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| | <p>Corporate travel planner information / travel agent information (<i>as applicable</i>)</p> <p>Financial / Transaction Data</p> <p>Vehicle Information (<i>as applicable</i>)</p> <p>Photograph (<i>as applicable</i>)</p> <p>Health Data (<i>as applicable</i>)</p> <p>Reservation details (<i>as applicable</i>)</p> <p>Account Data</p> <p>Communication Data</p> <p>Location Data</p> | In relation to Health Data: with your consent. |
| <p>Guest welfare</p> <p>Ensure the health and wellbeing of guests, safely respond to and manage any guest health issues that are communicated.</p> | <p>Identity Data</p> <p>Contact Data</p> <p>Identity and Contact Data of your travel companion(s) (<i>as applicable</i>)</p> <p>Arrival and Departure dates (<i>as applicable</i>)</p> <p>Health Data</p> <p>Reservation Details</p> <p>Dietary details (<i>as applicable</i>)</p> | <ul style="list-style-type: none"> • Consent • Vital interests |
| <p>Transaction processing</p> <p>Process transactions (in person and online payments), including online and in-person delayed payment options (via payment operators), and transaction fee recovery.</p> | <p>Identity Data</p> <p>Contact Data</p> <p>Account Data</p> <p>Communication Data</p> <p>Financial and Transaction Data</p> | <ul style="list-style-type: none"> • Performance of a contract with you. |
| <p>Service communications</p> <p>Respond to your communications regarding our services, send you service updates, confirmations,</p> | <p>Identity Data</p> <p>Contact Data</p> <p>Travel Companion Data (<i>as applicable</i>)</p> | <ul style="list-style-type: none"> • Performance of a contract with you. • Otherwise, as necessary for our legitimate interests |

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| <p>invoices, technical notices, updates, security alerts, support and administrator messages, respond to your enquiries, requests or complaints.</p> | <p>Arrival and departure dates and times (as <i>applicable</i>)</p> <p>Preferences and interests</p> <p>Corporate travel planner information / travel agent information (as applicable)</p> <p>Account Data</p> <p>Financial / Transaction Data</p> <p>Communication Data</p> <p>Device Data</p> <p>Usage Data</p> | <p>(to operate, provide and improve our business; to communicate with you) – where our communications are not necessary to perform or enter into a contract with you.</p> |
| <p>Communications review</p> <p>Reviewing communications with you for customer support and quality assurance and training purposes, and related recordkeeping.</p> | <p>Identity Data</p> <p>Contact Data</p> <p>Account Data</p> <p>Review / Feedback / Queries</p> <p>Financial / Transaction Data</p> <p>Communications Data</p> <p>Device Data</p> <p>Usage Data</p> | <ul style="list-style-type: none"> • Necessary for our legitimate interests (to operate, provide and improve our business; to communicate with you) – where our communications are not necessary to perform or enter into a contract with you. |
| <p>Security and safety</p> <p>Keep our business, including our online services, our premises and our employees, customers, vendors, and visitors secure and address threats to their safety or the safety of others; to detect and prevent criminal activity or fraud (online and in person). For example, online we use malware and spyware monitoring tools to detect suspicious activity and algorithms to detect</p> | <p>Identity and Contact Data</p> <p>Account Data</p> <p>Financial / Transaction Data</p> <p>Vehicle Information</p> <p>Photograph</p> <p>Device Data</p> <p>Usage Data</p> <p>CCTV Data</p> <p>Communications Data</p> <p>Location Data</p> | <ul style="list-style-type: none"> • Necessary for our and our third parties' legitimate interests (to operate and provide our business; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, visitors and premises). |

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| unauthorised access. In our premises, we use CCTV monitoring. | | |
| Compliance Manage compliance with our terms of service, manage our compliance hotline and related internal reporting. | Identity and Contact Data Account Data Communications Data Transaction Data CCTV Data Social Media | <ul style="list-style-type: none"> • Performance of a contract with you. • Otherwise, as necessary for our legitimate interests (to operate, provide and improve our business; to detect or prevent illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors, and visitors. • Legal obligations. |
| IT and online administration and maintenance To administer and maintain our online services and our IT systems (including monitoring, troubleshooting, data analysis, testing, system maintenance, repair and support, reporting and hosting of data). | Identity and Contact Data Account Data Device Data Usage Data | <ul style="list-style-type: none"> • Our and our third parties' legitimate interests (to operate, provide and improve our business; to detect or prevent Illegal activities (e.g. fraud) and/or to manage the security of our IT infrastructure). |
| Tracking technology Manage our use of tracking technologies such as cookies (including enabling you to manage your cookie preferences) and analyse collected data to learn about our online services, to improve our online services, and to develop new products and | Account Data Device Data Usage Data Social Media Location Data Account Data Advertising and Marketing Data Communications Data | <ul style="list-style-type: none"> • Consent (where required under applicable law – see cookie consent tool on our website). • Otherwise (for strictly necessary cookies) our legitimate interests to operate, provide and improve our business, to |

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| <p>services. This includes website analytics, identifying browsing / purchasing trends and patterns and evaluating this information on an aggregated, group(s) basis (Social Media, Advertising and Marketing Data) and individual basis (Account Data, Device Data, Location Data and Usage Data).</p> | | <p>improve our online services or use the insights to improve or develop marketing activities and promote our products and services.</p> |
| <p>Data analytics Analyse data including metrics related to consumer transactions and behaviour (online and offline), to assess trends and the effectiveness of our advertising and marketing campaigns, to help us understand your needs and provide you with better service and offers, to drive customer engagement, promote our brand, and inform other business decisions by understanding consumer behaviour.</p> | <p>Account Data Transaction Data Device Data Usage Data Social Media Communications Data Advertising and Marketing Data</p> | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business, to improve our online services or use the insights to improve or develop marketing activities and promote our products and services). |
| <p>Promotional communications Contact current and prospective customers (including online visitors) about our products and services, promotions, competitions and events we think may be of interest, including our newsletter and other promotional mailers and electronic communications.</p> | <p>Account Data Usage Data Advertising and Marketing Data Communication Data Social Media</p> | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business; to communicate with you and to develop marketing activities and promote our products and services). |

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| <p>Personalise online experience</p> <p>Personalise and customise your experience, including to provide local or otherwise targeted content and information for customers, and to tailor the content and advertising served on our online presence.</p> | <p>Account Data</p> <p>Advertising and Marketing Data</p> <p>Usage Data</p> <p>Device Data</p> <p>Social Media</p> | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business, to use the insights to improve or develop marketing activities and promote our products and services). |
| <p>Live chat and chatbots</p> <p>Assist with customer service, answer Guest questions, and improve your experience on certain Aimbridge websites and apps. Chatbots may use artificial intelligence to understand and respond to your queries or to route your request to the appropriate location.</p> | <p>It isn't always necessary for you to share your personal data with us when using a chatbot service, but if you chose to do so then the following types may apply:</p> <p>Identity Data</p> <p>Contact Data</p> <p>Arrival and departure dates and times (<i>as applicable</i>)</p> <p>Financial / Transaction Data</p> <p>Reservation details (<i>as applicable</i>)</p> <p>Dietary details (<i>as applicable</i>)</p> <p>Account Data</p> <p>Communication Data</p> <p>Location Data</p> | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to operate, provide and improve our business, to improve our online services or use the insights to improve or develop marketing activities and promote our products and services). |
| <p>Advertising</p> <p>Personalise, target, and deliver advertising for our products and services on third party websites, apps, and other online services</p> | <p>Account Data</p> <p>Advertising and Marketing Data</p> <p>Usage Data</p> <p>Social Media</p> <p>Contact Device Data</p> | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to improve our business, to promote our products and services) |

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| (including to identify audiences and individuals like you to better tailor our marketing campaigns and communications), and measure the effectiveness of our campaigns and adjust our methods. | | and to use the insights to improve or develop our marketing activities). |
| Social media Analyse social media performance metrics to evaluate and execute social media campaigns, including to interact with our current and prospective customers on various social media channels to promote our products, run contests and promotions, answer questions and otherwise drive and monitor customer engagement and satisfaction. | Account Data Advertising and Marketing Data Social Media Communication Data Usage Data Device Data | <ul style="list-style-type: none"> • Consent (where required under applicable law). • Otherwise, our legitimate interests (to improve our business, to promote our products and services and to use the insights to improve or develop marketing activities). |
| Competitions Administer sweepstakes, competitions or surveys | Identity and Contact Data Account Data Communication Data Social Media | <ul style="list-style-type: none"> • Our legitimate interests (to drive customer engagement and to collect user perceptions and measure satisfaction). |
| Legal and regulatory obligations Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law. | Identity and Contact Data Account Data Transaction Data Usage Data Location Data Communication Data | <ul style="list-style-type: none"> • Legal obligation. |
| Legal rights Protect our legal rights (including where necessary, to share information with law | Identity and Contact Data Account Data Transaction Data Location Data | <ul style="list-style-type: none"> • Our legitimate interests to protect our business interests. |

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| enforcement and others), for example to defend claims against us, to conduct litigation to defend our interests or to prosecute those responsible for illegal activities at hotels, leisure clubs or facilities managed by us. | CCTV Data Usage Data Communication Data | |
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4. Who we share your personal data with

We share your personal data with the following categories of recipients:

- **our group companies**, who provide data processing services necessary to provide you with our services (for example, to support the delivery of, provide functionality on, or help to enhance the security of our online booking process), or who otherwise process personal data for purposes described in this Privacy Notice. Our group companies, to which we transfer your personal data, operate in the UK, Europe and around the world;
- **hotel brands**, when you check-in to a hotel under our management that carry a franchised hospitality brand (e.g. Crowne Plaza or Holiday Inn, to facilitate brand loyalty programs.
- **third party service providers and partners** who provide data processing services to us as necessary to provide you with our services, or who otherwise process personal data for purposes described in this Privacy Notice. The following table lists the main categories of third party service providers we engage that process your personal data, and the types of personal data they receive in order to provide us these services;

| Services | Personal data |
|--------------------------------------------|-----------------------------------------------|
| IT services | Name, Email, Phone, Home address, IP Address. |
| Behavioural Advertising and Paid Marketing | IP address. |

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| Email Marketing (where applicable, on behalf of the hotel) | Name, Email, Phone, Home address, Gender, Birth month and day, Email opt in, Order ID, Loyalty ID, Coupon code. Subsequent email opt out. |
| Social Media Campaigns and Contest Promotions | Social medial contact details / username, photographs. |
| Affiliate Marketing | IP address, Email, Browsing time and behaviour, Website/App history. |

- **third party services** when you use third party services either online through our website or in one of our locations, for example, third party payment services, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services;
- any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or so a third party can defend theirs, or (iii) to protect your vital interests or those of any other person;
- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure (obtained separately from any contract between us).

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5. Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal data about you, including to serve interest based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice <https://aimbridgeemea.com/cookies/>.

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6. How we keep your personal data secure

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures are designed to provide a level of security appropriate to the risk of processing. Specific measures we use include encrypting your personal data in transit and at rest; using an industry standard framework as part of any Information Security programme; employing advance malware protections; implementation of other reasonable security defences (including vulnerability management, access management and recovery/resilience measures).

Where you have created an account with us that uses a unique password to enable you to access your reservations and/or membership, it is your responsibility to keep this password secure and confidential.

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7. International data transfers

As we operate at a global level, and our parent company is based in the US, in some cases, where your personal data is transferred to another Aimbridge group company or third party, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Where we transfer your personal data to countries and territories outside of the European Economic Area and the UK, we will take appropriate safeguards to ensure that your personal data will remain protected in accordance with this Privacy Notice and applicable data protection laws.

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8. Data retention

We retain the personal data we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). In certain circumstances, we will need to keep your information for legal reasons after our contractual relationship has ended. The specific retention periods depend on the nature of the information and why it is collected and processed and the nature of the legal requirement. For example, to deal with any legal matters (e.g. if there is a legal claim and the information is relevant to the claim) or to resolve requests and complaints (such as if you raised a complaint).

When we have no ongoing legitimate need or legal reason to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

Details of retention periods for different aspects of your personal data are available from us on request by contacting us using the contact details provided under the “How to contact us” heading below.

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9. Your data protection rights

Individuals located in the UK and EEA have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the “[How to contact us](#)” heading below.

- You may **access, correct, update or request deletion** of your personal data. You can make these requests by contacting us using the contact details provided under the “[How to contact us](#)” heading below or through our [Privacy Web Form](#).
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data [or **request portability** of your personal data, (i.e. your data to be transferred in a readable and standardised format)]. You can make these requests by contacting us using the contact details provided under the “[How to contact us](#)” heading below or through our [Privacy Web Form](#).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “[How to contact us](#)” heading below, through our [Privacy Web Form](#), or via the marketing settings in any email we send to you. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about your account or our ongoing business/ relations.
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time by using the contact details provided under the “[How to contact us](#)” heading below. Withdrawing your consent will not affect the lawfulness of

any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. For more information, please contact your local supervisory authority. Contact details for supervisory authorities in Europe are available [here](#) and for the UK [here](#). Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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10. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

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11. How to contact us

If you have any questions or concerns about our use of your personal data, please contact us using the following details: privacy.emea@aimbridge.com.

The controller(s) of your personal data detailed in this Privacy Notice depends on the location of the Aimbridge hotel, leisure club or other hotel facilities (including any restaurants or leisure club) you are visiting.

If you are visiting an Aimbridge managed hotel, leisure club, meeting venue or food & beverage facility in the UK, the data controller of your personal data is Interstate United Kingdom Management Limited which is registered with the ICO with registration number ZA062478.

If you are visiting an Aimbridge managed hotel, leisure club, meeting venue or food & beverage facility in the EU, the data controller of your personal data is the Aimbridge entity that manages your hotel. Please email privacy.emea@aimbridge.com for confirmation of this entity.

Please note that Aimbridge is our brand name and the relevant entity may have a different name.