

Privacy Statement

This is the statement of how Club Vitae applies the data protection principles to data processed on this website. It is provided to fulfil our obligations under the General Data Protection Regulation (GDPR), which requires greater transparency with regard to your personal information, and which gives you greater control over how we use it.

To ensure that the personal information we hold on you is accurate and up-to-date, please inform us of any relevant change to your contact details.

- Who we are?
- General statement
- The information we collect about you
- When we collect and use data about you
- Who we share your information with
- Security and retention procedures
- Your individual rights
- <u>Contact details</u>
- <u>Complaint resolution</u>

Contact Details

Club Vitae 4th Floor, Burton Court, Burton Hall Drive, Sandyford, Dublin 18, Ireland

Who we are?

Throughout this privacy statement, "we", "us", "our" and "ours" refer to Club Vitae and Dalata Hotel Group plc.

"Club Vitae" means fitness group consisting of 13 clubs located at Clayton Hotels and Maldron Hotels across Ireland. Read more <u>here</u>.

"Dalata Hotel Group plc." means hotel operator of Clayton Hotels, Maldron Hotels.

Club Vitae and **Dalata Hotel Group plc**. having its registered office: 4th Floor, Burton Court, Burton Hall Drive, Sandyford, Dublin 18, Ireland with registered number: 534888.

We fully respect your right to privacy, any personal information, which you volunteer to Club Vitae and Dalata Hotel Group plc. will be treated with the highest standards of security and confidentiality.

General Statement

We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such. Some technical terms used in this statement are explained at the end of this page.

This statement outlines how we protect and manage your personal data. Please also read our Cookie Policy, which tells you how we use cookies. For a better understanding of our product and service please read our <u>Terms and Conditions</u>.

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services, you understand and acknowledge that we will collect and use personal information as described in this Privacy Statement.

If you have any questions about how your information is gathered, stored, shared or used, please contact <u>dataprotection@dalatahotelgroup.com</u>. You have a number of rights in relation to your information, including the right to object to the processing of your personal information for direct marketing or where the legal basis for our use of your data is our legitimate business interests.

To ensure that the personal information we hold on you is accurate and up-to-date, please inform us of any relevant change to your contact details.

As we might amend this page from time to time, we encourage you to visit our Privacy Statement page regularly.

The information we collect about you

1. Personal Information

As defined in GDPR, personal information is "any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier". It is information that identifies you as an individual or relates to an identifiable individual.

We may collect various personal information which you provided us with:

- Contact information, including: full name, company name, email address, phone number, home address
- Transaction information, including payment and card details.
- Guest feedback
- CCTV images

2. Sensitive Personal Information

The term "sensitive information" called in GDPR "special categories of personal data", refers to information related to your physical or mental health, racial or ethnic origin, political opinions, religious or other beliefs, your sexual life, genetic data, biometric data (if used to identify an individual) or trade union membership.

In general, we do not collect sensitive information on our website unless it is volunteered by you. We do use health information provided by you on our member application form in house at our reception. This is to ensure you are fit and able to exercise and use our facilities.

3. Information from online activities

We collect information about your internet activity using the technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Privacy.

We may collect certain information, like your IP address, or browser, and information about your computer's operating system, application version, language settings and clickstream data which shows the traffic of your visit around this website (for example pages accessed and documents downloaded). We also collect the previous website address from which you reached us and the domain name used (for example .i.e., .com, .org, .net) If you're using a mobile device, we might also collect data that identifies your mobile device, device-specific settings and characteristics and latitude/longitude details.

4. Personal information from children

We do not knowingly collect their personal information. As a parent or legal guardian, you should not allow your children to submit their personal information without your permission.

5. Personal data you give us about others

In situations when you purchase Club Membership on behalf of someone else, you should only provide us with information about other people if you have their permission to do so. It's your responsibility to ensure that the other person is aware that you have done so and that this individual has accepted that we use their personal information as outlined in our Privacy Statement.

When we collect and use data about you

We use your personal information for various purposes:

1. To provide our products and services to you and perform our contract with you, we use your information in certain cases, such as:

GYM MEMBERSHIP

We use your personal information to administer your membership. If the required personal data is not provided, we will not be able to administer it. On occasion, we may get in touch with you by email or by phone with information related to your membership. This is to respond and handle requests you have made or to assist you and provide you with other relevant information.

2. To manage our business for our legitimate interests:

"Legitimate Interests" means the interests of our company in conducting and managing our business to enable us to give you the best service and products. Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights. You have the right to object to this processing if you wish, and if you wish to do so please email <u>dataprotection@dalatahotelgroup.com</u>. Please bear in mind that if you object this may affect our ability to carry out below tasks for your benefit.

ONLINE SERVICES

As you make enquiries and engage with us, information is gathered about you. In order to assist you and provide with relevant information, we may process your personal information when you communicate with us using our Contact Us, Free Trial or Personal Training enquiry forms. Or externally via social media to question us or inform us of any requests or preferences you may have.

DIRECT MARKETING

- 1. We use your contact information to send marketing communication about our services as permitted by law (Privacy and Electronic Communications Regulations which regulates our marketing activities). We send our members regular newsletters by email. There may be other times when we get in touch by phone or by texting you, depending on the contact information you share with us.
- 2. If you voluntarily sing-up to our Newsletter, using the newsletter signup form, your email address will be added to our mailing list and you will receive regular newsletters with offers by email.
- 3. When you participate in our promotional activities (e.g. competitions during trade shows or on our social media channels), your contact information will be collected to administer these promotions. If you agree (opt-in), we will use your contact information to send you regular news and offers related to our products and services. You will only be added to our marketing database with your prior marketing opt-in permission located on the form your contact details were collected.

You may opt-out from marketing communication at any time by clicking the relevant link in the e-mail message, by texting STOP as specified in the SMS or by contacting the marketing department at <u>dataprotection@dalatahotelgroup.com</u>.

Who we share your information with

Our commitment is to protecting your privacy. We protect your information from unauthorised use or loss and will only pass your data to our business partners, to fulfil your requirements, improve our services or where we are required to do so by law.

We use a range of data processors to provide services – either directly or indirectly. Where relevant, these companies are required to comply with our data privacy and information security standards when handling personal data and we aim that they do not compromise your personal data and information. We may share your personal data and information if we believe in good faith that such disclosure is authorised by law or is necessary to protect your personal safety. Such disclosure may include a cross-border transfer of personal data and information. If legally compelled to disclose your information to a third party, we will use commercially reasonable efforts to notify you in advance of a disclosure unless legally prohibited.

Security and retention procedures

We take security responsibilities seriously, employing the most appropriate physical and technical measures, including staff training and awareness and we review these measures regularly.

We will keep your personal data for as long as it is necessary to enable you to use our services, to provide our services to you, unless a longer retention period is required. This is to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business, including to detect and prevent fraud or other illegal activities. All personal data we retain will be subject to this Privacy Statement. If you have a question about a specific retention period for certain types of personal data we process about you, please contact us via the contact details provided below.

Your individual rights

1. The right of access to your personal data

If you have given your personal data and information to us, you have the right to ask us to advise you of the scope of information we process about you, the purpose and nature of the processing, and information on who we share it with.

 You can do the above by emailing <u>the completed</u> <u>form</u> to <u>dataprotection@dalatahotelgroup.com</u>. Please write "Request personal information" in the subject line of your email. 2. You can also print out <u>the completed form</u> and send your requests in writing to Dalata Central Office, 4th Floor, Burton Court, Burton Hall Drive, Sandyford, Ireland.

Download the access request form (PDF).

2. The right to rectification

You can also request to update, correct your personal information. We strive to retain only data that is accurate, complete and up to date.

Please contact us to ensure that the personal information we retain is up to date.

You can do that by emailing <u>dataprotection@dalatahotelgroup.com</u>. Please write "Request personal information update" in the subject line of your email.

3. The right to deletion

You can also request to delete your personal data at any time. However, we may need to retain certain information for legal or administrative purposes, such as record keeping or to detect fraudulent activities. You can opt out of marketing contact upon request. If you are concerned about potential violation of your privacy rights, please advise us of your concerns and we will strive to resolve them as soon as practically possible. You can do the above by emailing <u>dataprotection@dalatahotelgroup.com</u>. Please write "Request personal information deletion" in the subject line of your email.

4. The right to object processing

You have the right to object to processing your data under our business for our legitimate interests. Where we are using your personal data on the basis of your consent, you are can withdraw that consent at any time subject to applicable law. You can do the above by emailing <u>dataprotection@dalatahotelgroup.com</u>.

5. The right to data portability

You have the right to data portability which allows you to obtain and reuse your personal data for your own purposes across different services. This right applies where your personal information is being processed based on consent or for a performance of a contract and the processing is carried out by automated means (excluding paper files).

The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same. You can do the above by emailing <u>dataprotection@dalatahotelgroup.com</u>

6. You have the right to complain to the Data Protection Commission or another supervisory authority <u>here</u>

Contact details

If you have any questions about your personal data or if you wish to exercise any of your data rights, please contact us:

Email: <u>dataprotection@dalatahotelgroup.com</u> Phone: +353 (01) 206 9400 Postal Address: Data Protection, Dalata Hotel Group plc., Burton Court, Burton Hall, Sandyford, Dublin 1, Ireland

Complaint resolution

All customer complaints are promptly escalated to the relevant manager. We deal with all complaints fairly and promptly and all issues are resolved as quickly as possible. Where any customer is dissatisfied with the outcome of our efforts to resolve their complaint, the matter will be raised with senior management. Where any customer remains dissatisfied, they are notified of their rights to refer their complaint to the relevant Ombudsman.