

# Keystone House Limited

## PRIVACY NOTICE

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

- 2.1. The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Keystone House Ltd. collecting/processing their personal data.
- 2.2. All Employees/Staff of Keystone House Ltd. who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

#### 3.1 About Us

Keystone House Ltd provides accommodation for customers who agree to the stated Terms and Conditions. Our bookings are usually made online, via third party booking agents and online service providers, selected by Keystone House Ltd as it sees fit. These booking agents/providers will normally be the source of the personal data we subsequently process.

Our Data Protection Officer and data protection representatives can be contacted directly here: [dpo@keystone-group.net](mailto:dpo@keystone-group.net)

The personal data we collect and process is detailed below:

Personal data type:	Source (where Keystone Ltd. obtained the personal data from if it has not been collected directly from you, the data subject)	What the data is used for:
Full Name	Processed from Hostelworld, Booking.com, Myallocator. For group bookings: bookings email ( <a href="mailto:bookings@thebrill.co.uk">bookings@thebrill.co.uk</a> )	To perform our contract with you and complete a booking reservation.
Email address	Processed from Hostelworld, Booking.com, Myallocator. For group bookings: bookings email ( <a href="mailto:bookings@thebrill.co.uk">bookings@thebrill.co.uk</a> )	To perform our contract with you and complete a booking reservation.

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Nationality	Processed from Hostelworld, Booking.com, Myallocator. For group bookings: bookings email (bookings@thebrill.co.uk)	To perform our contract with you and complete a booking reservation.
Credit/Debit Card details	Processed from Hostelworld, Booking.com, Myallocator. For group bookings: payment is transferred via BACS.	To perform our contract with you and complete a booking reservation. To take payment for said reservation or additional terms (Please see Keystone terms and conditions).
Personal Identity information upon arrival. (Passport, Driver's license, National Identity Card).	Processed via TRUST ID.	To perform our contract with you and complete a booking reservation. For security purposes, to confirm identity.

### 3.2. Consent

By accepting this privacy notice and our terms and conditions you are giving us permission to process your personal data specifically for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

Keystone House Ltd always process your data under one of the following legal bases:

- To fulfil our contractual obligations with you
- In the legitimate interests of our business
- To meet our legal and regulatory obligations

We therefore do not process any sets of data based solely on you granting consent, as by agreeing to utilise our services you are agreeing to allow us to process your personal data in accordance with the above stated legal basis for processing your data.

You may withdraw consent or access your data at any time by requesting and completing a Data Subject Access Request Form.

Please note, as we often source your personal data from third party booking agents and online service providers you will also be subject to the data privacy policy of those parties and would need to contact them directly to access their data protection information.

### 3.3. Disclosure

# Keystone House Limited

## PRIVACY NOTICE

Keystone Ltd. will not pass on your personal data to third parties without first obtaining your consent, unless the provision of that data is to meet our legal obligations with regulatory or law enforcement agencies. Keystone House Ltd utilises TRUST ID for verifying identity documents so that we are able to complete our contract with you.

### 3.4. Retention period

Keystone Ltd. will store your personal data for a maximum of 6 months after your last transaction with us. Where financial or other information has to be retained to meet our regulatory or financial obligations, information may be kept up to 7 years, but will be anonymised where appropriate.

Please note; we obtain some of our personal data from third party companies, if you would like to be informed of their retention period you would have to consult them directly.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Keystone House Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6. Complaints

# Keystone House Limited

## PRIVACY NOTICE

In the event that you wish to make a complaint about how your personal data is being processed by Keystone Employment Group you can contact Keystone's nominated Data Protection Officer at **[dpo@keystone-group.net](mailto:dpo@keystone-group.net)**

You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: [ico.org.uk](http://ico.org.uk)

#### 4. Further information

##### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

##### How we use your information

This privacy notice tells you how we, Keystone House Ltd. will collect and use your personal data in order to initiate contract with yourself, to provide accommodation.

##### Why does Keystone House Ltd. need to collect and store personal data?

In order for us to provide you with accommodation, we need to collect personal data to initiate said contract and be able to provide our services. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

##### Will Keystone House Ltd. share my personal data with anyone else?

We will not pass your personal data on to third-party service providers contracted to Keystone Ltd. in the course of dealing with you.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise. Keystone House Ltd uses a service called TRUST ID to manage personal identity confirmation.

##### How will Keystone Ltd. use the personal data it collects about me?

Keystone House Ltd. will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Keystone House Ltd. is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

# Keystone House Limited

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### Under what circumstances will Keystone House Ltd. contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

Keystone House Ltd., at your request, can confirm what information we hold about you and how it is processed. If Keystone House Ltd. does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
  - Contact details of the data protection officer, where applicable.
  - The purpose of the processing as well as the legal basis for processing.
  - If the processing is based on the legitimate interests of Keystone Ltd. or a third party, information about those interests.
  - The categories of personal data collected, stored and processed.
  - Recipient(s) or categories of recipients that the data is/will be disclosed to.
  - If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
  - How long the data will be stored.
  - Details of your rights to correct, erase, restrict or object to such processing.
  - Information about your right to withdraw consent at any time.
  - How to lodge a complaint with the supervisory authority.
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- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
  - The source of personal data if it wasn't collected directly from you.
  - Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

Keystone House Ltd. accepts the following forms of ID when information on your personal data is requested: Passport, Driver's License, National Photo Identity Card.

### Contact details of the Data Protection Officer / GDPR Representative:

dpo@keystone-group.net