



## DATA MANAGEMENT POLICY

### WHO WE ARE

Elegantly perched on Falmouth's harbour is The Greenbank Hotel. The town's oldest hotel built in 1640, it is the only hotel in the south west to boast its own quay and private pontoons.

With uninterrupted panoramic sea views, the 60-bedroom, four-star hotel has also reopened its very own quayside pub, *The Working Boat* – a nod to the 300-year-old workers' and locals' tavern.

From the comfort of the award-winning two rosette restaurant, cosy lounge and bar or harbour facing rooms, guests can gaze at boats in the historic harbour, and across the water to the quaint fishing village of Flushing.

More than half of the hotel's 60 bedrooms are harbour facing with some offering floor-to-ceiling bay windows and balconies. For those looking to get on the water, boat trip operators, picnic trips, kayaking, paddle boarding and water-sports companies pick up and drop off direct from the hotel's quay.

### THE INFORMATION WE USE AND WHERE WE GET IT FROM

#### Data processing

The Greenbank Hotel processes data for email marketing purposes under the legal basis of 'Legitimate Interest.' Therefore, anyone who has transacted with The Greenbank Hotel can also be contacted for email marketing purposes.

This includes:

- All data with a known source (including past customers, enquiries, and competitions where the data has been collected in line with PECR)
- Recipients who have engaged or transacted within the last two years

## CUSTOMER RIGHTS

You have a number of legal rights to control what we do with your information. For example, you can ask us to tell you what information we have about you and obtain a copy; correct or update information that is wrong; stop sending you marketing material.

You are able to unsubscribe from our marketing communications at any time by contacting [reception@greenbank-hotel.co.uk](mailto:reception@greenbank-hotel.co.uk) or by clicking 'unsubscribe' on any of our e-newsletters.

For more information on how we do this please contact [gina.sutton@greenbank-hotel.co.uk](mailto:gina.sutton@greenbank-hotel.co.uk).

We hope that we can resolve any queries, but if we don't you can contact the Information Commissioner's Office (ICO).

## MARKETING

By giving us your personally identifiable information, we may from time to time, send you marketing updates via email or SMS. If you would prefer not to receive such information in the future, please let us know and we will honour your request immediately.

Our privacy policy about cookies on our website can be [viewed here](#).

### Data fields

The following data fields are stored on our email marketing platform:

- *Email address*  
This data field is stored so that we can contact through email marketing communications.
- *First name, Last name*  
These data fields are stored so that The Greenbank Hotel can send personalised email communications.
- *Postcode, County, Country*  
To ensure that we can segment data appropriately, for dynamic email content. For example, local postcodes are sent local information that might appeal to them.
- The county and country fields are stored for national and international location based segmentation.
- *Package type, Booking type, User type*  
These fields mean that we can send relevant content to our guests in our pre-stay communications. For example, a guest who has booked on our bed and breakfast terms will have the option to upgrade to dinner, bed and breakfast.

- *State*  
If a guest cancels their stay, the state must be recorded to stop them from receiving our pre-stay and post-stay email communications.
- *Source*  
This is crucial as it shows us the 'source' of how we have collected our subscriber data. For example, what competition they might have entered, whether they were a leisure guest, or a wedding enquirer.
- *Future arrival new*  
To ensure that guests are sent a pre-stay email five days prior to their arrival at The Greenbank Hotel.
- *Departure date new*  
To ensure that guests are sent a post-stay email two days after departure following their stay at The Greenbank Hotel.
- *Wedding submission date*  
This field is stored so that our automated wedding emails can be sent to anybody who enquires about holding their wedding at The Greenbank Hotel.
- *Date of last stay*  
This is stored so that we can identify any lapsed guests.
- *Stayed before*  
This is stored so that exclusive 'guest only' email communications can be sent.

## COMMUNICATION

### Email sending patterns

The Greenbank database is contacted regularly. The hotel demonstrates a fixed sending pattern, with monthly e-newsletters sent at the beginning of every month.

## HOW LONG WE KEEP YOUR INFORMATION

### Data retention

The Greenbank Hotel will hold onto data for two years. This is because we often see a trend in guest stays, with many of our guests staying every other year, so our communications are still relevant and valuable to them. If you don't open our emails or book again with us, we'll stop sending you emails after two years.

## SECURITY

We are committed to ensuring that your information is secure with us and with third parties who act on our behalf. We use many tools to ensure your information remains confidential and accurate.