

Personal Data Protection Law (FAQs)

PROCEDURE VALIDATION

Version	Corporate area	Approved by:		Approval date
1	Operations (Process Owner)	Operations Control Director Chief Operations Officer	Anja Loijens Ramón Aragonés	July 2012
	Internal Audit	SVP Internal Audit		
	Resources	SVP Human Resources		
	Strategy & Development	Chief Commercial Officer		
	Strategy & Development	SVP Quality & Competition		
	Corporate Counsel	VP Legal Affairs		
	Management Committee			Steering Minutes 09/07/2012

UPDATES

Version	Approved by	Approval date
2	SPV Operations	December 2018
	Organization Director	

OBJECTIVE AND SCOPE

The Personal Data Protection Law (LOPD) search to **guarantee and protect**, concerning the personal data, the public freedom and the **basic rights** of the legal persons, and specially their personal and familiar honor and privacy.

In this document you will find the most frequent question that can come up in the hotels regarding the application of the personal data protection law and related matters. **All NH Employees** need to know what to do in the cases you can find below

SUMMARY

1. Frequently Asked Questions (FAQs)
2. Related procedures

1 FREQUENTLY ASKED QUESTIONS (FAQS)

Responsible: all the employees of NH Hotels

Nº	CASE	WHAT TO DO	FURTHER DETAILS
1	The personal data protection law applies to all the hotels because the company head office is in Spain? Or it depends on the country of each hotel?	The Personal Data Protection Law applies in all hotels of the chain independently of the country in which they are. As a general principle Spanish Data Protection Law applies unless provided different or if the applicable Data Protection Law in a country provides further mandatory requirements; for example, this is the case in Italy where Italian Data Protection Law has to be considered.	
2	Which data can we require to the client?	We can ask for the relevant data necessary and required by law or in order to perform a business transaction as agreed upon with a customer or a business partner. All data will be only gathered with the consent and knowledge of the client. Will take the necessary security measures in order to guarantee the data confidentiality.	
3	How do we protect the confidential information given by the clients? Can we print files or emails that contain this information for internal use?	We have to protect the clients personal data and take the necessary security measures depending on the nature of the data we are managing (Three security levels: low, medium, high) We can print the information but always taking the necessary security measures. We strongly recommend not printing any documents with client's personal data.	
4	How can we modify the data given by the client or simply check the data we have available?	In the case the client requires to access, cancellation, exclusion or opposition (ARCO rights) his/her personal data, the client will have to send an e-mail to dataprotection@nh-hotels.com indicating in the subject field: "Data Protection".	<i>Form to exercise the ARCO rights</i>

Nº	CASE	WHAT TO DO	FURTHER DETAILS
5	How may we use the data of our guests? Can we use it to send them information?	We may only use the information according for the purpose that we have informed he/she when he gave his personal data to us. We can only send commercial information to the client if we have informed him previously and he has given his univocal authorization. (Consents in Registration Form clauses).	
6	Can we share the personal information of the clients with third parties? In which cases?	As a general rule, third parties can only have access to client's personal data it is required in order to provide the service required and the client was informed previously, or when we are asked to do by law or in case of a legal investigation.	
7	It is compulsory to ask for an ID or Passport and register all the persons occupying the room?	We have to identify and register all the occupants of a room (even the persons not included in the reservation) always following the law legal criteria of each country.	<i>Check-in</i>
8	Is it compulsory to sign the official police record (or similar documents in other countries)?	As a rule, it is compulsory for all the guests sign their official forms. This form is gathered by us on behalf of the local authorities according to the applicable law. These files will be kept in the hotel or the given file-period in chronological order and in a cabinet only for these files.	<i>Check-in</i> <i>Templates and File</i> <i>Infographic_ Child Data Use Policy</i>
9	Is it compulsory to sign the Registration Form?	The signature on the Registration Form is the acceptance of the terms and conditions of the reservation. Only we can accommodate the client if we have the document signed.	<i>GDPR_ Front Desk Impact_ Registration Form User Guide</i>
10	Can under age guests stay alone in our hotels? What kind of documents do we require to do it?	In the case of unaccompanied minors it is compulsory a written authorization of his parent or guardian, allowing them to stay alone or a legal emancipation certificate.	<i>Check-in</i> <i>Infographic_ Child Data Use Policy</i>
11	Do we have to give the guests' data to the police when required? In which cases?	We have the obligation to help the police only if we receive written requirement from them.	<i>Customer care</i>

Nº	CASE	WHAT TO DO	FURTHER DETAILS
12	We receive a call at the front office for a guest; do we transfer to the room? If they give the name or the room number?	If we receive a phone call, without confirming if the client is in the hotel we will ask for the room number. If the caller knows it we will transfer the call to the room of the guest; if the caller does not know it we will inform the client that we cannot check if the guest is in the hotel and inform the caller that we cannot transfer the call.	<i>Visits, calls and messages</i>
13	A guest receives a call and they want to leave a message; shall we write down the message? Are we giving up hints that the client is staying in our hotel?	If we receive a phone call, without confirming if the client is in the hotel we will ask for the room number. If the caller knows it we write down the message; if the caller does not know it we will inform the client that we cannot check if the guest is in the hotel and inform the caller that we cannot write down the message	<i>Visits, calls and messages</i>
14	A guest receives a visit, but the visitor does not know the room number, what should we do?	Without confirming if the client is in the hotel we will call the client to inform him about the visit and requesting his authorization to confirm that his is at the hotel and to give his room number. In case of registration, we will do the check in as per our normal procedure.	<i>Visits, calls and messages</i>
15	We are required to send a duplicate of an invoice; in which cases can we send it? What documents do we have to require to the client?	We will not send an invoice duplicate unless requested directly by the client. If we receive it by email we will request a copy of the ID or passport of the client to verify the request.	<i>Invoice and Check-out</i>
16	We receive a parcel/envelope to keep at the front office, and someone will come later to take it. What should we require to the person who brought the parcel/envelope?	If we keep it at the front office, the person giving the parcel/envelope will need to identify the person that will take it. When the indicated person comes to take the parcel/envelope he will need to show an ID or Passport.	<i>Luggage and parcel deposit</i>
17	Someone brings us his CV to send it to our head office Human Resources department, shall we take it?	We will not accept any CV. The person interested in working with us has to fill the adequate application in our Employment Web Page.	

2 RELATED DOCUMENTS

Check-in
Infographic_Child Data Use Policy
Customer Care
Visits, calls and messages
Check-out and invoicing
Luggage and parcel service
GDPR – Frequently asked questions