

GDPR: FREQUENTLY ASKED QUESTIONS

Business Processes – Operations
April 2024

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Question#1: Do regular customers have to sign the Registration Form?

- ✓ Concerning the acceptance of booking conditions, the Registration Form signature is mandatory
- ✓ Yes, it is necessary that each guest fills in the Registration Form at each stay at the hotel
- ✓ The customer is not obliged to respond check boxes of commercial communications consents
- ✓ Logic impression of the responses of the commercial communications consent clauses (GDPR 7 & 8):
 - YES (X): Will not be printed again, unless email field of CRM file is not filled out
 - NO (X): Will be printed in future stays of the guest
 - YES () NO () : It is equal to NO and so will be printed in future stays

Question#2: Does the Registration Form apply for groups?

As you know, it is necessary to register in TMS all customers lodged at the hotel. Thus, the guest who belongs to a group must sign the Registration Form.

In exceptional cases (such as system failures, leisure groups, layovers, etc.) and to avoid blocking the reception, if the customer is not registered in CRM, the signature of the Registration Form is not required.

Question#3: How long does the Registration Form have to be filed?

This is defined by the legislation of each country, the minimum period to file the Registration Form is of 5 years.

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Question#4: Do new DISCOVERY customers have to sign the Registration Form?

Yes. DISCOVERY new members must complete and sign the new form. Enrolling in the DISCOVERY program entails acceptance to receive information about the program, so it is VERY IMPORTANT to keep this form signed by the customer, it is the sample of evidence for possible future claims. **The email is mandatory to register in the program.**

These consents are included in TMS clauses 3 + 4 (MINOR HOTELS EUROPE & AMERICAS) -they will be only shown if the customer is a DISCOVERY member- and are completely independent of clauses 7 + 8 (MINOR GROUP) -general for all customers.

The information of the customer file in CRM must be updated in terms of commercial communication consents, filling clause 3 with a YES, it autocompletes clause 4.

Question#5: What is the difference between Minor Group Partners and Minor Group Companies/Entities?

Minor Groups companies are all these entities that are part of Minor Groups, you can consult them at the following list: [Minor Group Companies](#). Minor Groups partners are third parties, which do not belong to Minor Groups, but with which Minor Groups signs a collaboration agreement, as for example for marketing campaigns or other actions.

Question#6: How do I have to deal with allergic guests in events with restaurant services?

Give this kind of information to as few colleagues as possible (waiters and cooks) and keep one single copy (commercial) for possible future claims. Disassociate the information and do not be explicit (avoid indicating names in any document, simply inform the table where the guest sits and the allergy/intolerance). Please check allergies procedure/template in the following document:

[Customer information management in TMS](#)

Question#7: Can I contact customers through the TPW (Booking, Expedia, ...)?

Yes, you can contact the customer, if you use “encrypted” the email informed by Booking/Expedia. There is no problem in contacting the customer to answer questions or operational problems (such as extra beds, cots, floors, etc.).

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Question#8: Can I call customers to confirm their arrival at 6:00 p.m.?

Be always careful with communications to customers. You can call /send emails to the customer to guarantee the reservation, but never offer services with extra cost for the customer, unless, you have her/his written consent for commercial communications. Do not request a credit card.

Question#9: Can I send an email before the arrival of the customer to inform about, for example, problems to access the hotel?

For operational communications, emails with interesting information for the customer are allowed (e.g., the Street is closed, strikes, confirmation of cots, extra beds, room types, etc.).

Question#10: Can I call a customer to inform about a forgotten object?

Yes, you can call the customer to inform about forgotten objects.

Question#11: Can I send booking confirmations?

Yes, booking confirmations are part of the accommodation contract.

Question#12: What are the DPO and Data protection emails for?



- **dpo@** manages legal doubts.
- **dataprotection@** is a mailbox where the customer can exercise her/his rights concerning Data Protection.

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Question#13: Can I send activation emails for the Online Check in and Online Check out services?

These are merely operational emails, so that you can send these activation emails for these services.

Question#14: Can I modify data from an invoice?

You should only modify an invoice when the owner of the invoice asks for it. In the event of agencies responsible for VAT recovering, the person in charge must authorize the change in the invoice.

Question#15: Concerning information in the banner:

The following clause should not be included in the signature of the emails:

“In accordance with current data protection regulations, you are hereby advised that your data will be processed by MINOR HOTELS EUROPE & AMERICAS, S.A., with Tax ID A-28027944, and registered address at Calle Santa Engracia 120 - 7, 28003, Madrid. These will be processed for the purpose of managing your accommodation reservation, any customization of services to be received during your stay, and sending out commercial communications, and the justification for this is the contractual relationship, except for sending the aforementioned commercial communications, which is justified by legitimate interest. Your data will be stored for 5 years, and in the case of commercial communications, until you expressly object. Your data may be disclosed to particular entities within the Minor Hotels Europe & Americas, which provide hotel and related services, which you may consult at the website www.nh-hotels.com/en/nh-hotel-group-companies for the purpose of managing, processing and executing your reservation. In this regard, you are advised that these entities may be located outside the European Economic Area, and this transfer is required to provide the services requested. You are advised that you have the right to request access to your personal data, or rectification, erasure, objection to and restriction and portability of the same. You may consult additional detailed information on Data Protection in the Privacy Policy at www.nh-hotels.com.”

Question#16: Difference between commercial communications and transactional communications:

Transactional communications are the ones that refer to the services already contracted by the customer (such as the email to carry out online check-in or online check-out). In these communications, no other additional services are available for the customer, only the one the customer has contracted. These communications solely comprise the information about the contract done with the customer. You cannot use these type of communications to offer a customer services or to include any information or promotion of additional services, although they are provided in the hotel (for example, restaurant, gym, spa, ...).

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Question#17: Can I include in the signatures of the emails, information/promotions of services that are provided in the hotel (for example, photographs of the food of the hotels restaurant)?

No. This is considered as commercial communication, so, unless the client has consented to receive commercial communications, you cannot include this kind of services in the signature.

Question#18: Can commercial communications be sent to customers?

Commercial communications can only be sent to those customers who have given explicit and written consent for it. In this regard, it is necessary to have the document with the consent.

Question#19: If a customer objects to receive commercial communications by Minor Group, does this affect the communications sent by the hotels?

Yes, if a customer does not want to receive commercial communications from Minor Group, her/his contact must be removed from the distribution lists designated for the mailing of commercial communications. Thus, the hotels must check previously in SAP, if the customer has given the consent for it.

Question#20: In the case of databases of potential customers:

Commercial communications of potential clients, included in the hotel's databases, can only be launched if the hotel has obtained the explicit and written consent of the customer. In this regard, it is necessary to have the document with the consent. If you do not have it, you can not send commercial communications until such databases are regularized. Minor Group will give indications on how to proceed with such databases.

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Question#21: If clients exercise data protection rights at the hotel reception or via the hotel's email address, how do we have to respond?

In both cases, such requests must be sent to Minor Group to the email address dataprotection@minor.com. Please consider that you must forward the request to this email as soon as it is received at the hotel, since there is a legally limited period to answer.

Question#22: In the case of requirements by the Security Forces of the State, who should answer and how?

In this case, as in the previous one, such requests should be sent to Minor Group, to the email address dataprotection@minor.com.



If you have any questions that are not covered in this document, you can submit your inquiry through the [NH Support Portal](#) (JIRA Service Desk) under the **Procedure Information** category.

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