

Hostelling Scotland Privacy Policy

Your privacy is important to us and we are committed to safeguarding the personal data of our customers and website visitors.

We want to be clear about the data we collect and process and we have updated our Privacy Notice to reflect the high standards established with the new EU General Data Protection Regulation (GDPR).

This privacy policy explains what to expect when we collect your personal information, including your individual rights and our obligations.



Policy introduction

In order to make a booking with Hostelling Scotland, you may be required to answer certain questions and provide certain personal information about yourself. In addition, such personal information may be disclosed to us during or as a consequence of our providing services to you. The General Data Protection Regulation (GDPR) sets out your rights as a consumer in respect of information held about you by businesses.

The [terms and conditions](#) under which you make a booking with Hostelling Scotland are provided to set out clearly the relationship between us. By making a booking and/or using our website you consent to these terms and conditions. However, this shall not impact on your rights in relation to your personal data which are explained below:

In summary

- We will not collect your Personal Information without your knowledge or in a manner inconsistent with this policy
- We will not share your Personal Information to third parties except as described in this policy, or unless you have authorised us to do so in advance
- We will allow you to view, correct or remove your Personal Information and other information that is accessible at any time
- We will take reasonable steps to protect the security of the Personal Information we collect from you

The remainder of this policy describes how we will treat your personal information.

Legitimate interests pursued by Hostelling Scotland

To promote the marketing and services offered by Hostelling Scotland as outlined in the section "The purpose for which we hold and may use your information".

The information which we may hold about you

- Personal details such as title, name, nationality, age, postal address, email address and contact telephone numbers. When booking accommodation for other people we may ask you to provide such information on their behalf
- Special requests and requirements as provided by you including information about your service preferences
- Transaction information including booking and payment details
- Your details in respect of any donations
- Membership details
- Unique booking codes/references
- Details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses
- From our corporate customers - business information, such as employer details, job title, company name, address and contact details
- General descriptions and details about your interests, demographic and lifestyle information
- Purchase history; where you have stayed and activities during your stay
- Information you provide regarding your marketing and communication preferences: customer rate and review responses, membership, special offers information, surveys, contests

The source of the information we hold about you

- Information submitted to us through the Hostelling Scotland website, when making a booking or enquiry or provided by you to us during your stay at a youth hostel within the Hostelling Scotland network.
- Through calls recorded with the Sales & Reservations department - Hostelling Scotland is allowed to monitor telephone calls to ascertain compliance with regulatory or self-regulatory practices
- Information provided by you to us whilst attending / visiting a Hostelling Scotland stall or event
- Information collected automatically when visiting the Hostelling Scotland website (see Cookies section for more information).
- Information received from a third party booking site such as Hostelling International, VisitScotland, HostelWorld, Expedia or Priceline. In this situation, we will process your data in accordance with the contract we have in place with such third parties. When we receive your personal information with a booking from a third party booking site (on-line travel agency), we will use your data in line with the contract we have in place with them.
- Third-party cookies - we work with third-party suppliers who may also set cookies on our website, for example Twitter, Facebook and LinkedIn. These third-party suppliers are responsible for the cookies they set on our Site. If you want further information please go to the website for the relevant third party.

Please note when you submit your personal information and any necessary information relating to other people, you're confirming that you have permission to do so and have read and agreed the terms and conditions of this privacy notice.

The purpose for which we hold and may use your information

- Customer services: for the provision of our services to you
- Reservations: to administer and manage your booking, to provide quotations and respond to your requests
- Guest reviews: to ask you to review your stay with Hostelling Scotland ensuring it has met your expectations
- Membership: to send member communications including Board information and elections

- Marketing: to send you marketing communications; in you making initial consent Hostelling Scotland shall maintain a marketing dialogue with you until you unsubscribe (which you can do at any stage). These communications include our newsletter containing news from our hostelling network including special offers
- Other communications: we may send you on-line surveys relating to improving Hostelling Scotland overall member and guest services
- We may need to respond in relation to a query or complaint you may raise with us and to check on the level of service we provide.
- Financial: to process transactions and payments
- Legal purposes: In certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance.
- Fraud detection and prevention: we may use your personal information for the detection and prevention of fraud and other illegal or unwanted activities
- Improving our services: finally, we use your personal information for analytical purposes, to improve our services, to enhance the user experience, and to improve the functionality and quality of our online travel services.

Information relating to young people

Hostelling Scotland welcomes youth groups. In order to deliver agreed contracted services and to comply with legislation the following information will usually be provided during the duration of the group stay in order to ensure the necessary arrangements are in place. Information will be restricted to the minimum amount needed and this includes full name, gender, special requirements, and nationality.

Where personal data or personal sensitive information has been received:

- The information will be stored securely
- We will not pass these details on to any other organisation, unless agreement has been obtained in advance and providing the sharing is to help deliver the services required.
- We agree to destroy the data securely when the trip and all related matters have been concluded.

Where required when working with children under 16, Hostelling Scotland will obtain consent from whoever holds parental responsibility for the child – unless the processing of information is held by an approved third party supplier contracted to do business with Hostelling Scotland who will then be responsible for obtaining agreement in advance

CCTV

CCTV and video recordings is operational in the public areas and back of house areas in a number of properties and video recordings may be made including audio. This activity is carried out for security and service reasons for the better management of Hostelling Scotland and security for all its guests, visitors and employees.

Some Telephone calls are recorded

In order to provide evidence of a business transaction and for training purposes external telephone calls to Hostelling Scotland business lines may be recorded and may be retrieved to verify the evidence of a business transaction with a supplier or client. This is covered mainly by the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (“LBP Regulations”).

Images

Hostelling Scotland will use imagery in the course of their business within media, print, publications such as the Hosteller magazine and social media channels. At all time the relevant prior consent will have been obtained,

Sharing information about you with other organisations

In order to deliver services, there may be occasions where we have to pass your information on to a partner organisation such as;

- Direct Marketing /Print organisations for the mailing/distribution of specific publications and notices.
- Email provider organisation responsible for the electronic distribution of our newsletter including special offers - you will only receive these communications if you have already given your consent to do so and you can choose to opt out of this at any time.
- For analysis - we may work with a third party specialist organisation to analyse customer, membership and web site user data to develop a greater understanding of our customers in order to shape and improve the product and services we offer.
- From time to time we may work use a third party provider to manage our social media; we will only share/ transfer your personal information with third parties who have contractual arrangements with us and on the understanding that they are GDPR compliant and has adequate measures in place to protect the information and will not pass it to any other party and that they will not use your information for their own business purposes. You should only receive this material if you have already given your consent to do so and you can choose to opt out of this at any time.
- For legal obligations - we may release information to the police or other authorities where we are under a legal obligation to do so.
- Partner organisations where we may also provide anonymous statistics to reputable third parties, such as Visit Scotland, Hostelling International or other National Hostelling Associations for the purpose of analysis. These statistics will not contain any personal information.
- Affiliate youth hostels when Hostelling Scotland may take a booking on their behalf and pass on your booking details to the manager or employee of that hostel.

Third Party Links

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Data Transfers

Hostelling Scotland will not transfer personal data to unless they are within the EEA or a country with an adequate level of data protection as defined by the European Commission.

Cookies

The Hostelling Scotland website uses “cookies”. Cookies are small pieces of information which are sent by a website to your web browser and remain on your computer until they are deleted. Cookies are sent by the Hostelling Scotland website to ensure that it does not unnecessarily show you information that you have already seen or have indicated as not being of interest to you. Cookies therefore enable the Hostelling Scotland website to offer you a more personalised service when using our website. You agree to our use of cookies and/or any other data tracking. If you do not wish to receive such cookies from us, please adjust your browser’s settings accordingly (See “Adjusting your Browser’s Cookie Settings” below). Please note however that this may restrict your use of the Hostelling Scotland website

We also use a third party service, Google Analytics, to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website however only processed in a way which does not identify any individual. Google will store this information however we do not make, and do not allow Google to make, any attempts to find out the identities of those visiting our website. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>

Adjusting your browser's cookie settings

Adjusting your browsers cookies is dependent on the Internet browser being used. The Help feature on most browsers will tell you how to prevent your browser from accepting new cookies. Alternatively you should check with the vendor who's browser you are using for specific details on how to do this.

Protecting your information

The security of your personal information is important to us and we are committed to keeping data safe and secure. We have in place a number of security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your personal information. However, all publicly accessible websites are susceptible to malicious practices, and we accept no liability if security is breached.

We do not broker or pass on information gained from your engagement with us without your consent. However, we may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Hostelling Scotland, our people, our customers and/or the wider community.

We further undertake that we will not hold information about you which is excessive in respect of the purposes for which it is processed.

Your consent

There is a notice on the home page of our website which describes how we use cookies and which also provides a link to our Privacy Policy. If you use this website after this notification has been displayed to you we will assume that you consent to our use of cookies for the purposes described in this Privacy Policy.

Who will hold your information

Your information will be held by Scottish Youth Hostels Association (also known as SYHA or Hostelling Scotland). Hostelling Scotland has its registered office at 7 Glebe Crescent, Stirling, FK8 2JA. Hostelling Scotland is called the “Data Controller” because it has control over and responsibility for your personal information.

Hostelling Scotland is the owner of the website www.hostellingscotland.org.uk including previously www.syha.org.uk

Keeping your information up to date

If any of the information that you have provided to Hostelling Scotland changes, for example if you change your email address, name or payment details, please let us know the correct details by sending an email to gdpr@hostellingscotland.org.uk or by contacting us using the details provided below in the [Contact us](#) section

In order to help the Data Controller keep your information up to date registered users may be asked to provide details of any changes in their information at regular intervals.

Retention Policy

Unless you have consented to receiving information, the period of use of the personal data supplied by you to fulfil our contract will be held in accordance with the terms of our agreement such as membership and statutory legislative retention periods.

Data storage

Data is held in The United Kingdom using different (multiple) servers. Hostelling Scotland does not store personal data outside the EEA.

Your rights as a data subject

At any point whilst Hostelling Scotland is in possession of or processing your personal data, all data subjects 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 you 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 not to be subject to the legal effects of automated processing or profiling.

Hostelling Scotland at your request in writing can confirm what information it holds about you and how it is processed.

You can request the following information

- 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 Hostelling Scotland or a third party such as one of its customers, 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.
- 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 (Data Protection Regulator).
- 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.

To access what personal data is held, you will need to complete a 'Subject Access Request' form and identification will be required

All requests should be made in writing to Hostelling Scotland to; Data Protection Officer, Hostelling Scotland, Head Office, 7 Glebe Crescent, Stirling, FK8 2JA or email gdpr@hostellingscotland.org.uk .

Hostelling Scotland "Subject Access Request" form is available by contacting us using the details provided in the [Contact us](#) section below.

Hostelling Scotland along with the "Subject Access Request" form will require copies of two forms of ID including one piece of photographic ID. Forms of ID acceptable include your national ID card, driving license, passport, birth certificate and a utility bill not older than three months.

If Hostelling Scotland is dissatisfied with the quality of the identification, further information may be sought before personal data can be released.

Information will be provided within 30 days of receipt of the written request to the Data Protection Officer.

In the event that Hostelling Scotland refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Complaints

If you have any queries about the process or how Hostelling Scotland handles your information, you should bring this to our attention without any delay so that we can deal with your concerns and queries. We would also welcome any suggestions for improving our process and procedures.

In the event that you wish to make a complaint about how your personal data is being processed please contact Hostelling Scotland. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

Hostelling Scotland

Data Protection Officer, Hostelling Scotland, Head Office, 7 Glebe Crescent, Stirling, FK8 2JA
E: gdpr@hostellingscotland.org.uk

Data Protection Regulator

The Information Commissioner's Office – Scotland, 45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0303 123 1115

Data Protection breach

Should there be a data breach; Hostelling Scotland will inform the ICO within 72 hours. The information provided the ICO will include;

- What has happened
- When and how we found out about the breach;
- The people that have been or may be affected by the breach;
- What we are doing as a result of the breach

Contact Us: Data Protection Officer

If you require further information or have any questions regarding this Privacy Policy, please contact us at:

Data Protection Officer
Hostelling Scotland
Head Office
7 Glebe Crescent
Stirling
FK8 2JA
E: gdpr@hostellingscotland.org.uk

Changes to our Privacy Policy

Our privacy policy is reviewed on a regular basis and was last updated in May 2018.

[Terms & Conditions](#)