

## Study Inn Limited

175 Corporation Street  
Coventry, CV1 1GU



### Background:

Study Inn Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our guests and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## 1.1 Information About Us

Study Inn Limited is a limited company registered in England under company number 07941727

Registered / trading address: 175 Corporation Street  
Coventry  
CV1 1GU

Data Protection Lead:

Email Address: [dataprotection@studyinn.com](mailto:dataprotection@studyinn.com)  
Telephone number: +44 (0) 2476 239349  
Postal Address: 175 Corporation Street  
Coventry  
CV1 1GU

We are a member of Unipol ([www.unipol.org.uk](http://www.unipol.org.uk)) and operate under the National Code Assured Accommodation Standards (<http://www.nationalcode.org>)

## 2.1 What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## 3.1 What is Personal Data?

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Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5.1, below.

## 4.1 What Are My Rights?

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Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our or collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.1.
- b) The right to access the personal data we hold about you. Part 10.1 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12.1 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12.1 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.1.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

## 5.1 What Personal Data Do We Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to take part in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our

		business and to inform our marketing strategy
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy

This information may be provided by yourself via our website or over the telephone. If you have contacted us through an agent then the agent may have shared this information with us on your behalf.

## 6.1 How Do We Use Your Personal Data?

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Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because there is a legitimate business reason to use it. Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.

With your permission we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 7.1 How Long Will You Keep My Personal Data?

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We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Contact data used for marketing purposes will be retained until you opt-out from receiving future marketing information (each marketing email will contain a link to opt-out);
- Any data relating to contracts, license agreements payments, charges and any other information relating to a booking or a stay at Study Inn will be retained for a period of five years from the date of your final departure.

## 8.1 How and Where Do You Store or Transfer My Personal Data?

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We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

- We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR.
- Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Access to your personal data is restricted to only those who require it to perform their duties.
- Data is stored on secure servers with security measures to prevent unauthorised access.

## 9.1 Do You Share My Personal Data?

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We may share your personal data with other companies in our group for the purposes of fulfilling our contractual obligations to you. This includes subsidiaries or our holding company and its subsidiaries.

We may sometimes contract with third parties including third parties operating under the Study Inn brand to supply services to you on our behalf. These may include payment processing, accommodation and marketing, as well as third parties to whom we sell, transfer, or merge parts of our business or our assets. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.1.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10.1 How Can I Access My Personal Data?

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If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.1. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11.1 Information About Our Use of Cookies?

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Our websites use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

It is possible to block some or all cookies, or even to delete cookies that have already been set; but you need to be aware that you might lose some functions of that website.

For more information about how we use cookies on our website please visit <http://www.studyinn.com/cookies.htm>

## 12.1 How Do I Contact You?

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To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email Address:	<a href="mailto:dataprotection@studyinn.com">dataprotection@studyinn.com</a>
Telephone Number:	+44 (0) 2476 239349
Postal Address	175 Corporation Street Coventry CV1 1GU

## 13.1 Changes to this Privacy Notice?

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We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on the Study Inn website ([www.studyinn.com](http://www.studyinn.com)).

**End.**