



CROWN LONDON ASPINALLS'

DATA PROTECTION POLICY 2017

1. Introduction

In accordance with the *Data Protection Act 1998 (Act)* and the *Data Protection Act Principles (Principles)*, the purpose of the Data Protection Policy (**Policy**) is to communicate the personal information handling practices of Crown London Aspinalls. The Policy provides a clear and complete understanding of the type of personal information that Crown London Aspinalls may hold and the way in which it is handled.

2. What does this Policy contain?

Part A – Personal Information Handling Practices; details our general information handling practices across the organisation including information about how Crown London Aspinalls collects, uses, discloses and stores your personal information.

Part B – Websites; explains Crown London Aspinalls' personal information handling practices when you visit the Crown London Aspinalls' or Crown Resorts' website.

Part C – Complaints; details how you may submit a complaint concerning a potential breach of the Policy and/or Act and how Crown London Aspinalls' manage the complaint process.

3. Where can I find more information?

You can find more information by contacting Crown London Aspinalls via the details below:

Via Telephone: +44 207 499 4599
In writing: The Data Controller
Crown Aspinalls London
27-28 Curzon Street
Mayfair
London
W1J 7TJ



4. Part A – Personal Information Handling Practices

a) Our Obligations under the Act

This Policy sets out how Crown London Aspinalls complies with its obligations under the Act. Crown London Aspinalls is bound by the Principles within the Act that regulate how organisations may collect, use, disclose and store personal information and how individuals may access and correct personal information held about them and submit a complaint about a potential breach of the Act.

In this Policy, *personal information* (as defined in the Act) means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

b) Collection

It is Crown London Aspinalls' usual practice to collect personal information directly from the individual. There may be occasions whereby Crown London Aspinalls collects personal information via a third party or a publicly available source; however, only in circumstances where the individual provides consent to such collection or could reasonably 'expect' Crown London Aspinalls to collect their personal information in this manner. Crown London Aspinalls only collects personal information for purposes that are directly related to its functions or activities, and only when it is necessary for or directly related to such purposes.

These purposes may include, but not limited to:

- Commencing a Crown London Aspinalls membership
- Hotel reservations and related services
- Food and Beverage
- Entertainment
- Marketing
- Competitions
- Financial transactions
- Complaint handling

Crown London Aspinalls also collects personal information as part of its normal communication processes directly related to those purposes, including:

- When an individual emails staff members
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- When an individual phones Crown London Aspinalls, it may store their phone number on its telephone system
- When an individual hands Crown London Aspinalls their business card.

c) Use and disclosure

Crown London Aspinalls only uses personal information for the purposes for which it was given, or for purposes that are directly related to one of its functions or activities, and it does not provide it to other organisations or anyone else unless one of the following applies:

- The individual has consented
- The individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
- It is required or authorised by law
- It will prevent or lessen a serious and imminent threat to somebody's life or health
- It is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.
- Crown London Aspinalls may share your personal information with an associated entity, other companies acting on behalf of Crown London Aspinalls, Crown Resorts Limited or other casino operators.
- Crown London Aspinalls may also share your personal information with overseas recipients located in countries where Crown Resorts Limited or an associated entity, has staff or a business, including without limitation, America, Vietnam, Thailand, Indonesia, Singapore, Malaysia, India, Hong Kong, Macau and Taiwan. Such disclosure is more likely if you are a customer residing outside of the UK.

d) Data Quality

Crown London Aspinalls takes steps to ensure that the personal information it collects is accurate, up to date and complete. These steps include maintaining and updating personal information when it is advised by individuals that their personal information has changed, and at other times as may be necessary.

e) Data Security

Crown London Aspinalls takes steps to protect the personal information it holds against loss, interference, unauthorised access, use, modification or disclosure and against other misuse. These steps include password protection for electronic files, securing paper files in locked cabinets and physical access restrictions.

When no longer required, personal information is destroyed in a secure manner or deleted.



f) Access and Correction

If an individual requests access to the personal information Crown London Aspinalles holds about them, or requests that it changes that personal information, Crown London Aspinalles will allow access or make the changes unless it considers that there is a sound reason under the Act or other relevant law to withhold the information. Should Crown London Aspinalles not agree to make requested changes to personal information, the individual may make a statement about the requested changes and Crown London Aspinalles will attach this to the individual's record.

Individuals can obtain further information about how to request access or changes to the information Crown London Aspinalles holds concerning them by contacting them (see details below).

g) How to Contact Crown London Aspinalles

Individuals can obtain further information in relation to this Policy, or provide any comments, by contacting Crown London Aspinalles via the details below:

By Telephone	+44 207 499 4599
In writing:	The Data Controller Crown Aspinalles London 27-28 Curzon Street Mayfair London W1J 7TJ

5. Part B – Websites

Users are advised that there are inherent risks in transmitting information across the internet. Individuals may contact Crown London Aspinalles by phone or in writing if they have concerns about making contact via the internet.

a) Collection

When browsing Crown London Aspinalles' and/or Crown Resorts Limited websites, you agree to your information being captured, as publicly available and in accordance with this Policy. When an individual opens a Crown London Aspinalles or Crown Resorts website, a record is made of the individual's visit and logs the following information for statistical purposes:

- The individual's server address;
 - The individual's top level domain name (for example .co.uk, .com, .gov, .org, .au, etc);
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- The pages the individual accessed and documents downloaded;
- The previous site the individual visited; and
- The type of browser being used.

Crown London Aspinalls does not identify users or their browsing activities except, in the event of an investigation, where a law enforcement agency may exercise a warrant to inspect server logs.

Crown London Aspinalls' also collects personal information that individuals choose to provide via online forms or by email, for example when individuals:

- Request to be on a mailing list and/or to become a member
- Make a booking request
- Submit a complaint, feedback or any other commentary

b) Cookies

Cookies are pieces of information that a web site transfers to your computer's hard disk for record keeping purposes. The cookies simply operate as a unique identifier, which helps Crown London Aspinalls to know what its customers find interesting and useful on its websites. Data collected from website use does not identify the user, allowing you to remain anonymous in Crown London Aspinalls data collection. Most web browsers are set to accept cookies; however, if you do not wish to receive any cookies, you may set your browser to refuse them. In some instances this will mean that you will not be able to take full advantage of parts of the website that provides you with improved service. When an individual closes their browser the session cookie set by our websites is destroyed and no personal information is maintained which might identify an individual should they visit Crown London Aspinalls or Crown Resorts website at a later date.

c) Use and Disclosure

Crown London Aspinalls only uses personal information collected via its websites for the purposes for which it was provided. Crown London Aspinalls does not share personal information about individuals with other organisations or anyone else unless one of the following applies:

- The individual has consented
 - The individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies
 - It is required or authorised by law
 - It will prevent or lessen a serious and imminent threat to somebody's life or health
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- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue. When an individual's email address is received by Crown London Aspinalles because they sent a message to it, the email address will only be used or disclosed for the purpose for which they have provided it and it will not be added to a mailing list or used or disclosed for any other purpose without the individual's consent.

d) Data Quality

Crown London Aspinalles maintains and updates personal information collected from or published on its website as necessary or when it is advised by individuals that their personal information has changed.

e) Data Security

Individuals who choose to join Crown London Aspinalles' or Crown Resorts' mailing lists, complete online forms or lodge enquiries will have their contact details stored on password protected databases. Staff members associated with website maintenance have access to Crown London Aspinalles' website backend system which is password protected. Crown London Aspinalles website server is also password protected.

f) Access and Correction

For information about how to access or correct personal information collected on Crown's websites see Part A '*Access and correction*' of this document.

6. Part C - Complaints

Crown London Aspinalles takes its obligations pursuant to the Act very seriously. Individuals who feel that their personal information may have been inappropriately handled in breach of this Policy or the Act may submit a complaint in writing to Crown London Aspinalles' Data Controller. Any complaint should set out in as much detail as possible; all the relevant particulars relating to the complaint, including why the individual believes Crown London Aspinalles' has breached the Policy and/or the Act.

Upon receiving a written complaint, Crown London Aspinalles will acknowledge receipt of the complaint in writing within 10 days. Crown London Aspinalles will investigate the matter(s) described in the complaint and then provide a substantive written response within 28 days from the date the written complaint was received by Crown London Aspinalles.



Crown London Aspinalls is registered with the Information Commissioners Office (ICO)
Registration Number Z6242841.