



# HFTP®

Hospitality Financial and  
Technology Professionals

## EU General Data Protection Regulation (GDPR)

### Compliance Tools for the Hospitality Industry

# GUIDELINES ON PRIVACY POLICIES FOR HOTELS

This document offers points to consider in the development of a hotel's privacy policy. In view of the multiple organisational and legal structures under which hotels operate, as well as the complexity of the third party landscape that may be part of the complete guest experience, this document serves as a guideline only.

This description was developed by the HFTP Hospitality DPO/GDPR Task Force. The task force is a group of hospitality industry experts tasked with developing hospitality-specific guidelines to assist with preparation for GDPR compliance.

Learn more about HFTP and the HFTP GDPR/DPO Advisory council at [www.hftp.org](http://www.hftp.org).

# Guidelines on Privacy Policies for Hotels

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As part of HFTP DPO/GDPR Task Force's role in providing leadership to the industry with regards to the implementation of the General Data Protection Regulation, HFTP Hospitality DPO/GDPR Task Force has prepared a set of guidelines to frame the contents and scope of a privacy policy for a hotel. The task force is a group of 23 hospitality industry experts tasked with developing hospitality-specific guidelines to assist with preparation for GDPR compliance.

With regards to the Privacy Policy, the original objective was to draw up a generic text applicable to most hotels through the slight modifications of a "core" Privacy Policy text. In view of the multiple organisational and legal structures under which hotels operate, as well as the complexity of the third party landscape that may be part of the complete guest experience, no "core" text would cover adequately all the possible scenarios.

Thus, the Task Force has deemed that provision of these guidelines will better serve the purpose.

The points presented below are based on analysis of the GDPR regulations made by the HFTP GDPR/DPO Task Force (see HFTP GDPR Hospitality Organization Data Flowcharts). All parties may not be in agreement and it is understood that the flowcharts are designed as a guideline to be adapted to suit individual situations.

Based on the above, the Privacy Policy of a hotel must address the following points:

## 1. Personal Information hotel collects

- Personal information given directly to the hotel
- Personal Information collected automatically
- Personal Information received from other sources (third parties)
- Personal information given directly to hotel about third parties (family members, parties to reservation)

## 2. Purposes of collection

- Reservations
- Marketing activities
- Market research
- Improving and personalizing services
- Call monitoring, etc.

## 3. Sharing data with third parties:

- Third-party service providers
- Payment providers
- Business partners
- To comply with legal or regulatory authorities, etc.

## 4. Accessing your own personal information for deletion, rectification, restriction

## 5. Security procedures in place to safeguard data

## 6. Retention of personal information

(general guidelines, not necessary to provide a specific period, for instance "no longer than necessary for the purposes that we collect and use data", "may be retained further to comply with legal or financial requirements"...) )

## 7. Hotels may include additional sections such as:

- a) Cookie page with use policies and information (separate from Privacy Policy)
- b) An additional item in the Privacy Policy on mobile devices apps used by the hotel.