

**Guest Privacy Notice**

**1 INTRODUCTION**

**CER Heyday Management Limited** ("Heyday", "us", "we" or "our") is committed to protecting and respecting your privacy. This Privacy Notice sets out how any personal data which we collect about you will be processed by us as data controller, including your rights with respect to that processing.

**2 PROCESSING OF YOUR PERSONAL DATA**

**What personal data do we collect about you?**

We collect the following categories of personal data about you when you apply for a room in our residence:

- Name
- ID/Passport
- Email
- Address
- Phone number

We also collect video images and static pictures of you through our use of CCTV systems in the Heyday premises and its immediate vicinity ("**Premises**"); which we highlight to you through appropriate CCTV signage in the Premises.

**Transfers**

We do not transfer your personal data outside of the EU.

**Why do we collect your personal data?**

We rely on different legal bases to process your personal data. For each legal basis set out below, we have set out the purpose for each processing operation and the categories of personal data which is processed in respect of same:

**a. Performance of a Contract**

<b>Legal Basis:</b> Necessary for the performance of our contract with you or to take steps for entering into our contract with you		
<b>Purpose of processing</b>	<b>Processing operation</b>	<b>Categories of personal data</b>
To provide you with temporary accommodation	Subject to you agreeing to the licence to reside, we will process your personal data in order to provide you with Heyday temporary accommodation.	<ul style="list-style-type: none"><li>- Name</li><li>- ID/Passport</li><li>- Email</li><li>- Address</li><li>- Phone number</li></ul>
To verify that you are over 18 years old	We verify your age, and therefore your eligibility to reside in Heyday accommodation, by reviewing the ID document which you provide to us, and confirming the same.	<ul style="list-style-type: none"><li>- Name</li><li>- ID/Passport</li></ul>
To verify your right to reside in Ireland	We verify your right to reside in Ireland, and therefore your eligibility to reside in Heyday accommodation, by reviewing the ID document which you provide to us, and confirming the same.	<ul style="list-style-type: none"><li>- Name</li><li>- ID/Passport</li></ul>

**b. Legitimate Interests**

<b>Legal Basis: Legitimate Interests</b>
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**4<sup>th</sup> Floor, 76 Baggot Street**  
**Dublin 2**

<b>Purpose of Processing</b>	<b>Legitimate Interests</b>	<b>Processing Operation</b>	<b>Categories of Personal Data</b>
We operate CCTV systems in the Premises in order: (i) to prevent crime and protect the Premises from damage, disruption, vandalism and other crimes; (ii) for your personal safety as well as the safety of other individuals who occupy the Premises; and (iii) to support law enforcement bodies in the prevention, detection and prosecution of crime.	Our interests in ensuring that the Premises are and continue to be a safe place and environment for all those who occupy it.	We collect and review CCTV footage to fulfil the purposes described.	Video images and static pictures.
To enable our security staff to identify guests entering the Premises (on the basis that those staff members will not have access to any other personal data relating to you).	Our interests in ensuring that the Premises are and continue to be a safe place and environment for all those who occupy it.	We collect and review your ID/ passport in order to fulfil the purposes described.	ID/Passport
You have the right to object to, and seek restriction of, this processing. You are entitled to request information on the balancing test which we have conducted with respect to this processing. To exercise your rights, or request information on the balancing test conducted, please see <b>Section 6</b> below.			

**c. Consent**

<b>Legal Basis:</b> Consent		
<b>Purpose of processing</b>	<b>Processing operation</b>	<b>Categories of personal data</b>
Subject to you providing your consent, to send you marketing	Based on any consent which you provide and associated marketing preference which you specify, we will use your email address to provide you with information about our product and services by email	Email address
You have the right to withdraw your consent for this processing. To exercise your rights, please see <b>Your Rights</b> below.		

**Who do we share your personal data with?**

To provide you with our services, we will share your personal data with the following third parties:

<b>Third Party</b>	<b>Purpose (why?)</b>	<b>Categories of Personal Data</b>
Legal Advisors	To enable our legal advisors to provide us with legal advice.	- Name - ID/Passport - Email - Address - Phone number -
Future potential purchaser	If we are involved in a sales of assets, merger, acquisition, business transfer, or other	- Name - ID/Passport - Email

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	change of control, we may share your personal data with other entities involved and will require any such successor business entity to honor this Privacy Notice.	<ul style="list-style-type: none"><li>- Address</li><li>- Phone number</li></ul>
Local law enforcement	To enable us to respond to applicable law or regulations, court orders or government requests.	<ul style="list-style-type: none"><li>- Name</li><li>- ID/Passport</li><li>- Email</li><li>- Address</li><li>- Phone number</li></ul>

**How long do we retain your personal data for?**

We will keep your personal data for as long as it is necessary to fulfil the purposes for which it was collected as described above and in accordance with our legal and regulatory obligations. This may mean that some information is held for longer than other information.

We keep your personal data for 7 years after you leave Heyday accommodation. To determine this retention period for personal data, we considered:

- The amount, nature, and sensitivity of the personal data and why it is collected and processed; and
- Applicable legal requirements. For example, we keep relevant personal data where it is necessary for reasons related to a legal claim or complaint, such as where we are subject to an investigation by a regulatory authority or where we are engaged in legal proceedings with respect to a claim related to your personal data or a claim brought by you.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

**3 YOUR RIGHTS**

You have several rights in relation to your personal data, which may be subject to certain limitations and restrictions. These rights include to:

- have access to a copy of your personal data, and to be informed about the processing of that personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third-party sources from where it was obtained);
- have us correct any inaccurate personal data about you and complete any personal data that is incomplete;
- request the erasure of your personal data;
- request a restriction on the processing of your personal data;
- object to the processing of your personal data on the basis that we are processing it in reliance on our legitimate interests (see Section 2 above). In such a case, we will stop processing your personal data unless we can demonstrate compelling legitimate grounds which override your interests and you have a right to request information on the balancing test we have carried out; and
- lodge a complaint with your local data protection authority using the contact details provided in Section 6 below.

We do not conduct any automated decision making and/ or profiling with respect to your personal data.

If you wish to exercise any of these rights, please contact us (see Section 6 below). We may request proof of identification to verify your request. We will endeavour to respond within a reasonable period and in any event within one month in compliance with applicable data protection law.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change using the contact details set out in Section 6 below.

#### **4 YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with your local data protection authority (e.g. the Office of the Data Protection Commissioner in Ireland (the, "**DPC**")) if you consider that we have infringed applicable data protection legislation when processing your personal data.

The DPC's contact details can be found here: [[LINK](#)].

#### **5 CHANGES TO OUR PRIVACY NOTICE**

If we make changes to this privacy notice, we will post these changes here and update the "Last Updated" date at the bottom it. If at any time we decide to use personal data in a manner materially different from that stated in this Privacy Notice, or otherwise disclosed to you at the time it was collected, we will notify you in writing, and you will have a choice as to whether or not we use your personal data in the new manner in accordance with your rights under data protection law.

#### **6 CONTACT US**

Questions, comments and requests regarding this Privacy Notice and your personal data are welcome and should be sent to the below email and/or postal address:

**Email:** Carmanshall@heyday.ie

**Address:** Heyday Carman's Hall, 16-22 Carman's Hall, Dublin D08 V22H

**Last updated: 12/09/2024**