Aviator Hotel (Farnborough) Limited, incorporating The Swan Pub Farnborough
Website Privacy Notice

AVIATOR PRIVACY NOTICE – 12th October 2026

Your privacy is important to us and we are committed to protecting and safeguarding the personal data that you share with us.

Please read this privacy notice carefully, as it will help you understand what we do with your personal data when you make contact with us or use one of our services.

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Who we are

We are Aviator Hotel (Farnborough) Limited, an independent hotel for elite travellers moving between London and the world's leading destinations. We are a company registered in England and Wales under company registration number 05812669, with our registered office

at 3 Bunhill Row, London, England, EC1Y 8YZ. We are registered with the UK supervisory authority, Information Commission ("IC") in relation to our processing of personal data under registration reference ZA262810.

Aviator Hotel (Farnborough) Limited also incorporates the Swan pub, 91 Farnborough Road, Farnborough, Hampshire GU14 6TL.

Purpose of this Privacy Notice

This document explains how we process your personal data when you contact us, supply services to us, use our services, visit our social media pages or interact with our websites https://www.aviatorhampshire.com/ and The Swan - Contemporary gastropub in Farnborough, Hampshire / Surrey .It also explains who we share your personal data with, how long we keep it and details about your information rights and how to make a complaint.

Data Controller

We are the data controller responsible for processing your personal data, as described in this privacy notice. This means that we decide how we collect and process your personal data.

This privacy notice applies to you if you:

- visit our website
- visit our hotel
- visit our pub
- use our facilities
- enquire about our services
- sign up to receive promotional communications from us

What personal data is

'Personal data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special category personal data' is more sensitive personal data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation. We may collect your health data if you advise us of any food allergies you have.

Personal Data we collect

The type of personal data we collect about you will depend on our relationship with you. For the type of personal data we collect, see the table below in the section entitled ‘Purposes, lawful bases and retention periods’.

How we collect your personal data

We collect your personal data in the following ways:

- Directly from you when you:
    - contact us by email, letter, phone, in person
    - use our online booking function or survey form
    - visit our website or social media pages or our hotel.

- From third parties such as:
    - travel agents or hotel booking website like Expedia and Booking.com
    - public sources such as social media, if necessary to enable us to provide you with a better service.

Purposes, lawful bases and retention periods

We only use your personal data where the law allows. Most commonly, we use your personal data for the purposes set out in the table below.

We will keep your personal data in line with our data retention schedule and for no longer than is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

AVIATOR

Categories of individuals	Categories of personal data	Purpose of processing	Lawful basis	Retention periods
Guests staying at our hotel, attending an event or using our facilities	• Identity e.g. name of the guests and participants • Address and email address • Title and job title (if required) • Date of birth • Date of wedding or other special occasion (if applicable) • Gender • Payment details • Telephone numbers • Reservation number • Dietary preferences • Disabilities (if required e.g. to provide wheelchair access) • Date of arrival and departure or date of event	To provide services to you including: • To fulfil our obligations under our contract with you • Administering your account • Processing payments • Registering your arrival and departure • Managing your stay, including preferences, allergies and special requests • Creating and updating your profile in our management system • Returning lost or forgotten items to you	• Contract • We rely on your explicit consent when processing your health data. • Legitimate interests	6 years from the date of the last entry.

	• Children's first names (if required) • Booking details			
Customers of the Swan pub	• Name • Address • Email address • Booking details • Payment details • Dietary preferences • Disabilities (if necessary eg: wheelchair user)	To make a reservation at the Swan	Depending on the type of personal data shared: • Legitimate interests • Consent	Until the event takes place and for 3 months thereafter
Individuals submitting a survey, online form or complaint or sending an email or raising a query	• Name of guests • Address and email address • Title • Gender • Reservation number • Date of arrival and departure • Stay details	To process your: • survey • online form • complaint • email • query	• Legitimate interests	12 months from the date of receipt.

	• Any other data you may decide to share with us	to ensure we are continually improving and providing services tailored to you.		
Individuals visiting our websites or using our app	• Login information, browser type and version • Time zone setting, browser plugin types and versions, operating system and platform, traffic data, location data and the resources that you access • Pages of our website that you view, Information about your visit including the URL clickstream to, though and from our site.	To collect user and analytics data Please also see our Cookie Notice for Aviator (Hotel) Farnborough Limited Cookie Policy. Please also see our Cookie Notice for the Swan pub https://www.swanfarnborough.com/cookie-policy	• Consent	Retention periods vary. Please see our Cookie Notice.

Existing and potential customers	• Name • Email address • Phone number	To market our products and services to you via email, letter and/or phone	• Consent for electronic marketing	• Until you opt-out
Any of the above	• CCTV images	For the purpose of: • crime prevention, detection or investigation of crime or the apprehension or prosecution of offenders • the safety of our property, employees, visitors, guests, suppliers and contractors • assisting with insurance claims • ensuring our property and authorised visitors are treated lawfully and respectfully and our policies are complied with	• Recognised legitimate interests • Legitimate interests	• Up to 10 days
Event attendee	• Photos and videos	For the purposes of using the images and footage for promotional purposes. For example, this may include publishing them on Aviator's website and social media. It may also include using the	• Legitimate interests	We will retain the data only for as long as necessary for the purpose, reviewing it at least once every

		images in hard copy printed literature. This list is not exhaustive.		10 years and securely deleting any data which is no longer required for the purpose.
Any of the above	Any of the above	• To comply with legal processes, regulations, government requests etc • To prevent, detect or investigate criminal activity or to apprehend or prosecute offenders • To comply with accounting and taxation regulations • To assess risks, obtain professional advice and manage legal disputes • To protect our websites and infrastructure from cyber-attack and other threats	• Legal obligation • Legitimate interests • Recognised legitimate interests	• 6 years from the date of the document or longer if needed for investigative purposes.

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

It is important that the personal data we hold about you is **accurate and current**. Please keep us informed if your personal data changes during your relationship with us.

Do you use my personal data for marketing?

If you consent, we may use your personal data to contact you for marketing purposes and provide you with details about our services. We may market to you by email and/or through social media and/or by phone.

You can change your mind on how we contact you for marketing purposes and ask us to stop contacting you for this purpose at any time. If we send you marketing on the basis of consent, you can withdraw your consent at any time. If you are signed up to our mailing list, you will have the option to unsubscribe by clicking a button at the bottom of any marketing email you receive from us. Alternatively, you may contact us using the details given below and we will remove you from all relevant databases and will not contact you again for marketing purposes. If you ask us not to send you marketing, we will ensure that we comply with your wishes. However, it may take us a short period of time to update our systems and records to reflect your request, during which time you may continue to market to you.

Please note that, even if you choose not to receive marketing, we may still use your personal data to provide you with important services communications.

Do you share my personal data with others?

We do not rent or sell any of your personal data. However, we may share your personal data with third parties such as trusted suppliers and service providers who will carry out services on our behalf, such as IT and CCTV service providers. We may also share your personal data with law enforcement, regulators, insurers, our advisors and other third parties, if we are under a duty to disclose the data to them or as part of legal proceedings or if it is otherwise fair and lawful and necessary to do so. See also the section on photos and videos.

Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards such as a suitable data processing agreement or data sharing agreement with that third party. We require all third parties to respect the security of

your personal data and to treat it in accordance with the law. We may also share your personal data with our outsourced Data Protection Officer, if the need arises.

If we wish to pass any of your more private or sensitive personal data (such as health data) onto a third party we will only do so once we have obtained your express consent, unless it is otherwise fair and lawful to do so.

Photos and videos

Photos and videos may be taken of you if you attend a private event at Aviator. These images and footage may be published externally, such as, but not limited to, on our website and on social media for the purpose of promoting Aviator. Printed images may also be used in hard copy literature for the same purpose. You will be notified in advance if photos and videos will be taken at the event you will be attending.

Can I withdraw my consent?

We may ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time. Please contact us using the details given below to withdraw your consent.

Do you share my personal data overseas?

Your personal data may be transferred to and stored in locations outside the UK and the European Economic Area (EEA), including countries that may not have the same level of protection for personal data.

We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests.

We have taken appropriate steps to ensure that when your personal data is processed in a country outside the UK, it does not have a materially lower level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your personal data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here international-data-transfer-agreement.pdf (ico.org.uk)) or

- When transferring your personal data to America, we may rely on the UK-US Data Bridge, where appropriate.

Artificial intelligence ("I")

We use AI technologies to drive efficiencies within Aviator. We use AI in line with our internal policies and procedures (including human oversight where applicable). For example, we use AI for administrative tasks such as writing emails.

Any use of AI technologies by us will be in accordance with technical and operational safeguards appropriate for data types.

What privacy rights do I have?

You have several rights under the applicable data protection law. The rights available to you depend on our reason for processing your personal data and include:

Your rights	
Your right to be informed	We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal data and our use of it. We have written this notice to do just that, but if you have any questions or require more specific information, please contact us using the details given below.
Your right to access your data	You have the right to ask us to confirm whether we process your personal data and, to have access to the personal data, and additional information such as the purposes for which we process your personal data, the categories of personal data we hold and who we share your personal data with. You may contact us using the details given below to request a copy of your personal data.
Your right to rectification	You have the right to ask us to rectify any personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.

Your right to erasure	In some circumstances, you may request that we delete the personal data.
Your right to restrict processing	You may ask us to stop processing your personal data. We will still hold the data but will not process it any further.
Your right to object to processing	In some circumstances, you may ask us to stop processing your personal data. If you object to us using your personal data for direct marketing, we will observe your wishes.
Your right to data portability	In some circumstances, you have a legal right to receive a copy of the personal data you have provided us with in a structured, commonly used and machine-readable format or ask us to transfer it to another organisation.
Your right re automated decision-making	You have a right not to be subject to a decision made solely on automated means which produces legal effects or similarly affects you.
Your right to withdraw consent	If you have provided your consent for us to process your personal data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

How to contact us and how to exercise your rights

In most circumstances you do not need to pay any charge for exercising the above rights and we have one month to respond to you. In some circumstances, this period of time may be extended by a further two months. We will let you know if it is likely to take us longer than one month to process your request. Please use the contact details below to contact us or exercise your rights.

For Aviator:

- Email at privacy@aviatorhampshire.com
- By post at 55 Farnborough Road, Farnborough, Hampshire GU14 6EL
- By phone on 01252 555890
- By using the “Contact us” form on our website

For the Swan:

- Email: privacy@swanfarnborough.com
- By post: The Swan, 91 Farnborough Road, Farnborough, Hampshire GU14 6TL
- Tel: 01252 510920

We may need to ask you to provide us with proof of your ID before we can process your request. For example, we may need you to send us a photocopy of your passport, driving licence, or birth certificate certified by a solicitor or bank plus an original copy of a utility bill showing your current address. Please let us know the information to which your request relates, including any useful details or dates.

Complaints

You have the right to complain if you consider that we have not complied with the data protection law when handling your personal data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain please use the contact details given below under “How can I exercise my rights”. We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain with the relevant supervisory authority. The supervisory authority in the UK is the Information Commission who can be contacted online at:

Contact us | ICO

Or by telephone on 0303 123 1113

For supervisory authorities in other countries within the EU see the link below:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

For more information about your rights contact us or see https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

Our EU representative

We have appointed GRCI Law Limited (of GRC International Group) to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR) or have any queries in relation to your information rights under the EU GDPR, please contact them using the following contact details:

eurep@grcsolutions.io

Please ensure that you include our company name in any correspondence you send to our EU Representative.

Social media

Our website includes social media links, that link to our presence on that specific site (e.g., our page on X (formerly Twitter)). These features may collect your IP address and information on which page you are visiting on our site and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by another company or are hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal data. We do not control such third-party websites and are not responsible for their content or privacy statements. We would encourage you to read the privacy notice or policy of every website you visit.

Do you use Cookies?

We collect certain information automatically and store it in log files. We sometimes collect information about our visitor's behaviour during their visits to our websites to help us provide better customer service, to improve the quality of our website experiences or to tailor advertising. For more information on which cookies we use and how we use them, please see our cookies notices:

For Aviator: Cookie Notice.

For the Swan: https://www.swanfarnborough.com/cookie-policy

Do you use personal data about children?

We do not knowingly collect or solicit personal data from anyone under the age of 16 without verifiable parent or guardian consent. In the event we learn that we collected personal data

from anyone under the age of 16, and do not have a parent or guardian's consent, we will delete that data as quickly as possible.

Changes to this document

We keep this document under regular review to make sure it is up to date and accurate. We encourage you to review this page regularly to identify any updates or changes to our privacy notice.

This privacy notice was last updated on the date given at the top of the document. You can obtain previous versions of this privacy notice by contacting us using the details in the ‘How can I exercise my rights’ section.

What if I need extra help?

If you would like this website privacy notice in another format (for example: audio, large print, braille) please contact us using the details given in the ‘How can I exercise my rights’ section above.