

## SURGEONS QUARTER PRIVACY NOTICE

### Introduction:

Surgeons Quarter Limited (SQ) is committed to protecting your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy explains how and why we collect, use, and protect your personal information when you stay, dine or attend any events.

### Who We Are:

SQ, a subsidiary of the Royal College of Surgeons of Edinburgh (RCSEd), oversees the management of Ten Hill Place Hotel, runs events in RCSEd and Ten Hill Place Hotel, and operates Cafe 1505 and SQ Travel. RCSEd serves as the joint data controller in charge of handling your data.

Data Controller: Ten Hill Place Hotel, 10 Hill Place, Edinburgh, EH8 9DS

Registered with the Information Commissioner's Office (ICO), Reg. No. Z5806303

Email: [sqfinance@surgeonsquarter.com](mailto:sqfinance@surgeonsquarter.com)

Data Controller: Royal College of Surgeons of Edinburgh

Registered with the Information Commissioner's Office (ICO), Reg. No. Z5806303

Email: [dataprotection@rcsed.ac.uk](mailto:dataprotection@rcsed.ac.uk)

To read our full Privacy Policy please visit: [Privacy Policy | RCSEd](#)

### Legal Basis for Processing:

We process your personal data under one or more of the following legal bases:

- Consent: When you provide clear, informed permission (e.g. marketing emails). You can withdraw your consent at any time.
- Contract: When processing is necessary to fulfil a service, you requested.
- Legal obligation: To meet our statutory and regulatory duties
- Legitimate interest: To manage operations and improve services (balanced with your rights). We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone

### What Information We Collect:

Categories	Data Types	Reasoning/Additional information
Identity Data	ID information including: <ul style="list-style-type: none"><li>• Name(s)</li><li>• Date of birth</li><li>• Identification documents</li></ul>	<ul style="list-style-type: none"><li>• <b>Contract</b></li></ul>



	permissions, consents or preferences that you give us	<p>be contacted for such purposes, or if you have purchased goods or services from us previously, we may contact you with information about similar goods or services that may be of interest.</p> <p>You may opt-out of this at any time by following the instructions in the marketing communication that you receive, by setting your preferences in your profile, or by contacting us. You may choose not to allow RCSEd to use your information like this in the first place by checking the appropriate box when providing your information on your initial registration.</p>
Special Category Data	<ul style="list-style-type: none"> <li>• Health information</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b></li> </ul>
Website/Cookies	<ul style="list-style-type: none"> <li>• Website and app user journey information</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b></li> </ul>
CCTV	<ul style="list-style-type: none"> <li>• Video recordings of public areas</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Legitimate interests</b></li> </ul>
Information about children	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Dietary requirements</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Contract</b></li> </ul>

#### What Information We Collect (Surgeons Quarter Travel):

Categories	Data Types	Reasoning/Additional information
Contact Data	<ul style="list-style-type: none"> <li>• Name(s)</li> <li>• Telephone number/mobile number</li> <li>• Email address</li> <li>• Billing address/delivery address</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Contract</b></li> </ul>

Identity data	<ul style="list-style-type: none"> <li>• Marital status</li> <li>• Title</li> <li>• Date of birth</li> <li>• Passport details</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Contract</b></li> </ul>
Financial/ Transaction Data	<ul style="list-style-type: none"> <li>• Bank account details</li> <li>• Payment card details</li> <li>• Source of funds</li> <li>• Details about payments to and from you</li> <li>• Other details of products and services you have purchased from us</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Contract</b></li> </ul>
Special Category Data	<ul style="list-style-type: none"> <li>• Gender</li> <li>• Dietary requirement which may disclose your religious or philosophical beliefs</li> <li>• Health Data</li> <li>• Next of Kin Name</li> <li>• Next of Kin Contact Number</li> <li>• Next of Kin Relationship</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b></li> </ul>
Travel Information	<ul style="list-style-type: none"> <li>• Flight Details</li> <li>• Accommodation Details</li> <li>• Travel Itinerary</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Contract</b></li> </ul>

#### How We Collect Your Information:

- Directly from you
- CCTV footage or other recordings
- Previous employers
- Market research organisations
- Credit reference agencies
- Providers of marketing lists and other personal information
- Suppliers and service providers

**Sharing Your Information:**

We have a joint controller relationship with the Royal College of Surgeons of Edinburgh. We process your personal information with that joint controller for the following reason: Parent Company.

Others we share personal information with

- Financial or fraud investigation authorities
- External auditors or inspectors
- Organisations we are legally obliged to share personal information with
- Emergency services
- Previous employers
- Suppliers and service providers

Please check the privacy policies of the relevant third-party providers, details of which are available on request, to fully understand how they will process your data.

**How We Use Your Information:**

We use your personal information:

- To provide services and goods
- For the operation of customer accounts and guarantees
- For dealing with queries, complaints and claims
- For service updates or marketing purposes
- To complying with legal requirements

**Retention of Your Data:**

We will keep your personal data for no longer than is necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements. We regularly review our data retention schedules and apply secure disposal methods when data is no longer needed.

Financial records must be kept for at least seven years after the transactions they cover are completed, according to legal requirements. Financial records are kept electronically and as a hard copy, electronic records will be converted into hard copy if required by auditors or authorised personnel.

**Your Rights:**

You have rights under data protection law, including to:

- Access your data

- Correct inaccurate data
- Request erasure (where legally permissible)
- Restrict or object to processing
- Withdraw consent at any time (where processing is based on consent)
- Lodge a complaint with the ICO ([www.ico.org.uk](http://www.ico.org.uk))

To exercise these rights, contact: [sqfinance@surgeonsquarter.com](mailto:sqfinance@surgeonsquarter.com)

### **Security of Your Data:**

We take appropriate technical and organisational measures to secure your data, including:

- Secure servers and encrypted storage
- Access controls and staff confidentiality training.

The transmission of information via the internet is not completely secure. Although SQ will do its best to protect your personal data, it cannot guarantee the security of your data transmitted to or from SQ website via the internet.

### **Data Protection Impact Assessments (DPIAs):**

Where new or high-risk processing is planned, we undertake DPIAs to assess and mitigate privacy risks in accordance with UK GDPR guidance.

### **Changes to This Notice:**

This notice is reviewed regularly and may be updated. The latest version will always be available on our website.

For further information, please contact [sqfinance@surgeonsquarter.com](mailto:sqfinance@surgeonsquarter.com)

**Last Updated:** November 2025