

General Data Protection Regulation (GDPR)



As a Processor of Personally Identifiable Information (PII), Revinate is taking steps to work towards General Data Protection Regulation (GDPR) compliance before GDPR's implementation date of May 25th, 2018. As Controllers, our hotel customers using Revinate products are ultimately responsible for GDPR compliance. As Processors, Revinate will provide various features to make compliance easier, some of which are described herein.



Revinate takes privacy seriously, and will continue to take steps to ensure the privacy of personal data that we handle. Although the main focus of GDPR is to protect PII of citizens of countries within the European Union, we will continue to ensure our efforts are spent protecting PII of all citizens.

Right of Access/Right of Portability

As a Processor of PII, Revinate will offer solutions for Controllers to download a copy of relevant personal data in a structured, commonly used and machine-readable format. This will include personal data that on behalf of a Controller, Revinate may have captured outside of Property Management System updates (e.g., data from website forms, IP address for Proof of Consent via Double Opt-in).

Right to Erasure

As a Processor of PII, Revinate will offer solutions for Controllers to permanently delete

personal data from Revinate. This step should be combined with the removal of data from the Controller and all other Processors, and will be available across all relevant Revinate products.

Proof of Consent

Revinate is developing a number of tools to offer solutions to Controllers to meet Proof of Consent requirements for GDPR. One of those solutions is a Double Opt-in feature. Using this feature, Controllers will be able to re-target existing contacts in their database via a Double Opt-in flow which both advises the end-user of privacy and profiling implications, and captures proof of consent on behalf of the Controller. It will also ensure the email address collected is

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valid, and that the user is aware and interested in receiving marketing communications.

Revinatē will, as part of its product design, continue to build logic into the system to encourage communication best practices. More specifically, the product encourages marketing to active and interested users while discouraging such efforts with users who do not wish to be marketed to.

Right to Refuse Profiling

Revinatē will continue to work on solutions for Controllers to clearly and concisely explain the purposes of processing, as well as offer Controllers the ability to clearly communicate the choices an individual has over the collection, use, profiling, and passing of personal information. Revinatē will ensure individuals have the ability to unsubscribe from marketing communications and surveys, and will continue to run checks on campaigns to ensure unsubscription links are forced on all communications.

If a Controller does receive a request from a guest to rescind their consent for profiling without exercising his/her right to erasure, Revinatē will offer Controllers the ability to mark a user as “requesting to not be profiled”. This will cease the profiling of their personal data, meaning they will no longer be segmented or targeted based on profilable details. They will however be contactable if they have maintained

explicit marketing consent and are displayed in a segment that does not have any profiling filters.

Data Protection by Design

Revinatē is dedicated to the continuation of staff training across teams to ensure our Privacy by Design Principles are applied to our products. We have philosophies around ensuring privacy by design, and creating products that are proactive in data protection, rather than reactive - preventative, rather than remedial. Through ongoing management and training, Revinatē’s infrastructure, design architecture, and product commit to respect the user privacy of our clients, as well as the privacy of user data for which we are the Processor.

Revinatē designs and develops technology to improve the guest experience at hotels worldwide. With Revinatē’s marketing and guest feedback software you can increase repeat bookings and drive more direct revenue with personalized, targeted email campaigns.
www.revinate.com