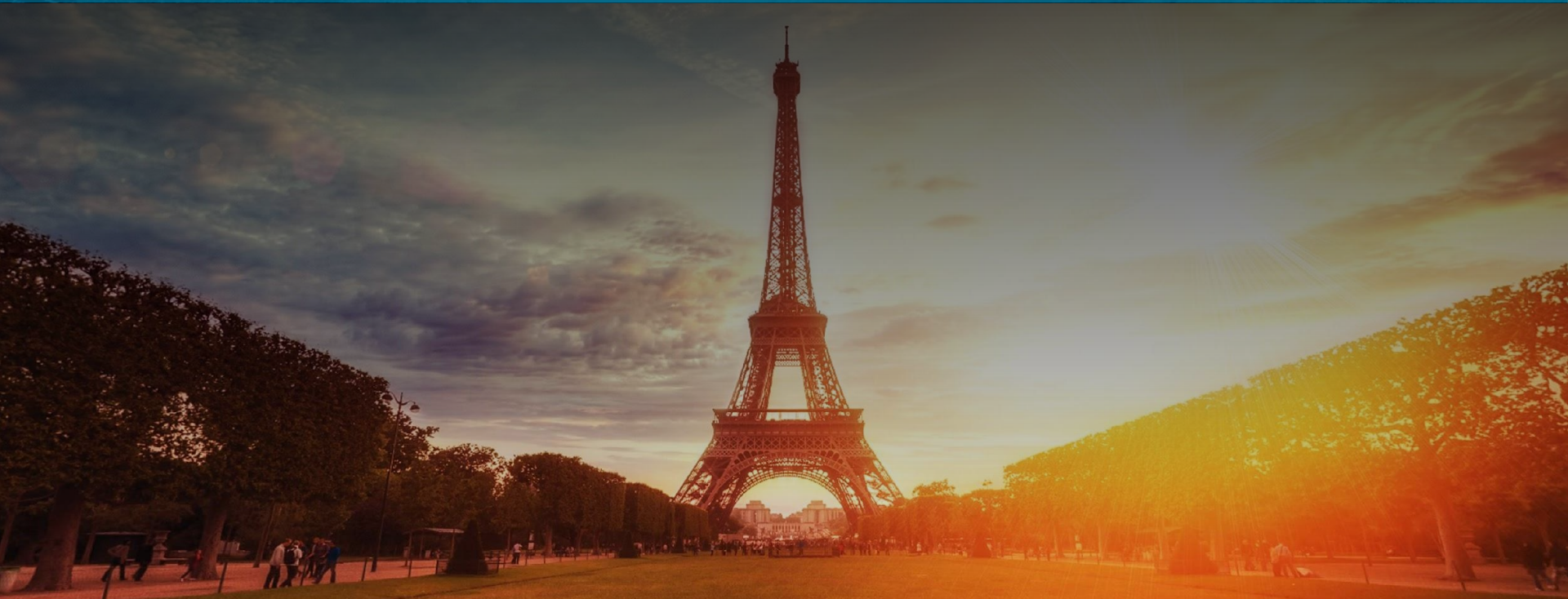


# General Data Protection Regulation

San Francisco | April 17, 2018



# Before We Get Started



You are all  
on mute



Please use your  
control panel to  
ask questions  
during the webinar



This webinar  
will be posted  
to Revinatē's  
Marketing Help  
Desk

# Your Presenters



**Anisha Yadav**

Hospitality Marketing Strategist

- Hospitality Veteran
- 8+ years experience in hotel revenue management
- Taj Hotels, Resorts & Palaces, Joie de Vivre, Two Roads



**Darya Subotka**

Hospitality Marketing Strategist

- Travel Industry Veteran
- 8+ years experience in Corporate Travel Management, OTA Operations and Marketing
- Europe and North America markets

- Explicit consent
- Implicit consent
- Double opt-in (DOI)
- GDPR (General Data Protection Regulation)



## General Data Protection Regulation

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**Goes into effect  
May 25th 2018!**  
Impacts any entity  
who has personal  
data of any EU  
resident or citizen

**Intended to  
strengthen and unify  
data protection for  
all individuals within  
the EU.** Aims to give  
control back to  
citizens/residents

**Fines for violating  
GDPR can be up to 20  
million euros;** however,  
may be less severe if  
companies can show  
they are working with  
data protection in mind

# GDPR: Does it affect your hotel?



If you have personal data of any EU resident or citizen (e.g., a guest from the EU stayed at your property), this applies to YOU



Hotels are especially vulnerable to data breaches given the huge amount of personal data that is stored and processed



The UK has stated that they will match the EU's GDPR regulation into their own laws after Brexit



## Personal Data

Any data relating to an individual, true or not, that could lead to the identification of an individual

- Name
- Address
- Phone number
- IP address
- Transaction history
- Traveling habits

# GDPR: Terms you need to understand

## Data Controller

The entity that determines the purpose and method of processing personal data (*The HOTEL*)

## Data Processor

The entity that processes personal data on behalf of the data controller. Oftentimes data processors are vendors and contractors for hotels (*REVINATE*)

## Data Subprocessor

The entity that processes personal data on behalf of the processor in order for them to complete their work (*SENDGRID*)



# GDPR: Fundamental Pillars

1

**PROOF OF  
CONSENT**

2

**RIGHT  
TO DATA  
PORTABILITY**

3

**RIGHT TO  
ERASURE**

4

**RIGHT TO  
REFUSE  
PROFILING**

## 1

### PROOF OF CONSENT

#### Consent is the basis of processing personal data:

- Consent requires a positive opt-in. Pre-checked boxes will not be accepted as consent
- Individuals must be clear on why they will have to provide personal data and for what it will be used
- It's mandatory to keep evidence of how, when, and what an individual consented to
- Double opt-in (*where an individual, upon signing up for email promotions, receives an email with a verification link*) is not required, but is a proven method for capturing Proof of Consent

#### Revinate's Solution:

- Double Opt-in + Safe Send checkbox

## 2

### RIGHT TO DATA PORTABILITY

**EU citizens have the right to access and request a copy of their own personal data at any time**

- EU citizens can update, delete, restrict, or move their data to another organization without interference, under any circumstances

**Revinate's Solution:**

- Contact [support@revinate.com](mailto:support@revinate.com)
- We are currently building this functionality into the Rich Guest Profiles

## 3

### RIGHT TO ERASURE

#### Also known as 'Right to Be Forgotten'

- Individuals have the right to request a controller delete all of the information known about them and end further distribution of the data
- Must be deleted in all systems (including all of your Processors)
- If reservation is booked again, data will be stored once again

#### Revinate's Solution:

- Contact [support@revinate.com](mailto:support@revinate.com)
- We are currently building this functionality into the Rich Guest Profile

## 4

### RIGHT TO REFUSE PROFILING

**This gives EU citizens/residents the right to avoid being profiled based on their personally identifiable information**

- Profiling is different than processing - this is NOT a request to remove this contact permanently
- This right is intended to help data subjects receive advertisements that aren't personalised - meaning the right to object to targeted advertisements based on things like social media interests and internet history

**Revinate's Solution:**

- Contact [support@revinate.com](mailto:support@revinate.com)

# GDPR: 3 things you must do tomorrow...

(...if you haven't already)

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## Update your Privacy Policy

The legal requirement to inform guests of the processing activities is your obligation as the data controller. Ensure your Privacy Policy properly communicates how, why, and what personal data you are processing.

## Sign the Data Processing Agreement (DPA)

The data controller is obliged to sign a DPA with all of its processors. Data processors should provide this to you.

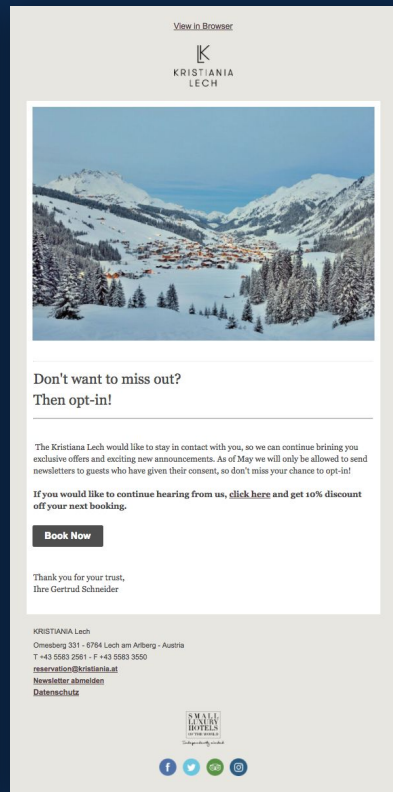
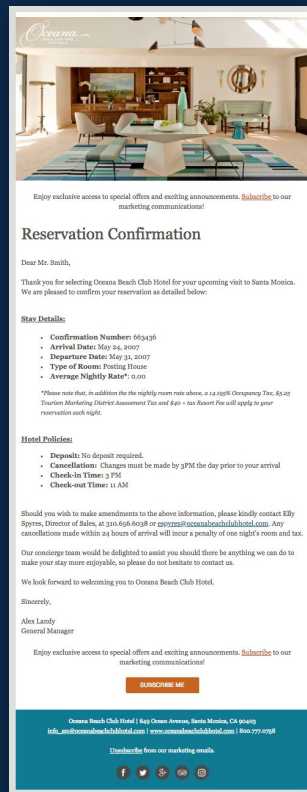
For Revinate's DPA, email [privacy@revinate.com](mailto:privacy@revinate.com)

## Ensure you have proof of consent for all European Union residents or citizens

Double opt-in!

# GDPR: Double Opt-In Best Practices

- **Send Double Opt-in email** to current database/EU guests. Create drip campaigns to continue sending based on who didn't open/click - up until May 24th.
- **Incentivize Double Opt-in** providing a Promo Code for sign up on the landing page
- **Include Privacy Policy** (IP capture, Profiling, Revinate as data processor, what is data used for)
- **Include a clear unsubscribe link**
- **Be clear and concise** with what data you have and what it will be used for when someone is opting in
- **Confirmations, modifications and cancellations** should include opt-in message/subscribe link, and all campaigns should include an unsubscribe link





# Demo Time!

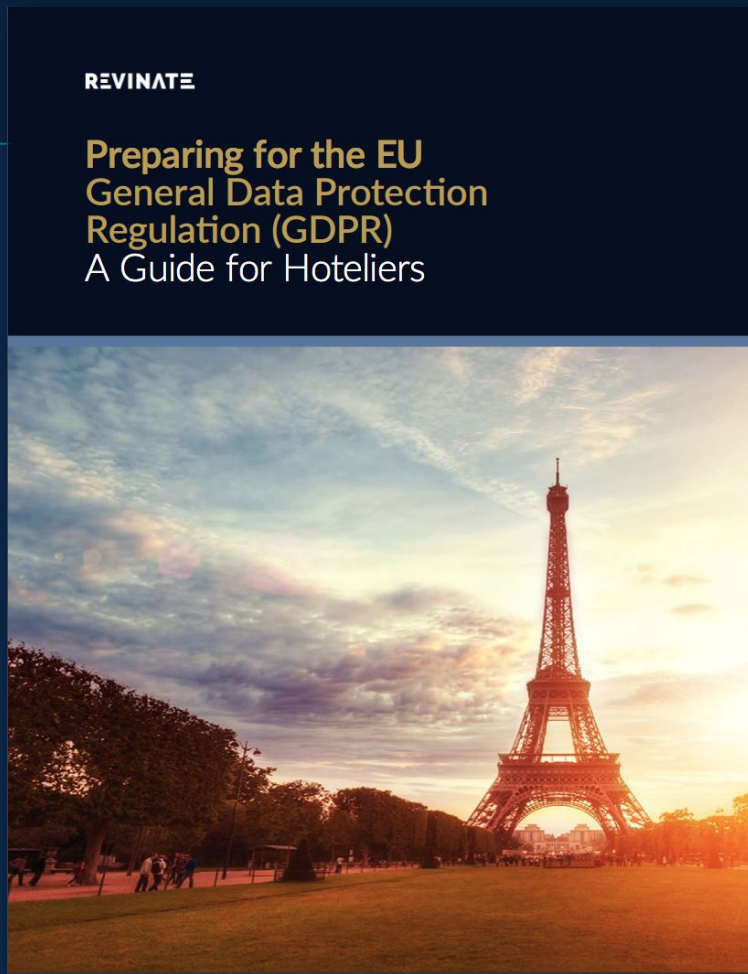
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# GDPR

## Want more?

- Visit [www.revinate.com/gdpr](http://www.revinate.com/gdpr)
- Grab our GDPR eGuide (see me!)
- Link to [FAQ's](#)
- Encore presentation of this webinar:
  - Wednesday, April 18th: 10am AMS
  - Thursday, April 19th: 1pm SGT

[Register here](#)



# Questions?

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