

GENERALDATA
PROTECTION
REGULATION (GDPR)
RESERVATION SALES
SUITE BEST PRACTICES

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GDPR Overview

General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European Union in relation to Personally Identifiable Information (PII). It also addresses the export of personal data outside the EU and all countries must comply when dealing with EU customers.

GDPR is enforceable as of May 25, 2018.

Below are some quick facts about GDPR:

- GDPR applies to all companies who process or hold personal data of EU residents, regardless of the company's location.
- GDPR is notrelated to PCI-DSS compliance.
 - PCI focuses on credit card data and security to avoid fraud and is regulated by credit card companies.
 - GDPR is focused on protection and control of all Personally Identifiable Information (PII) data associated with a single person and is regulated by European Parliament.
- As part of GDPR, EU Residents can ask to receive the following information:
 - Copy of their personal data
 - o Purpose of their data (i.e. automated marketing, profiling, etc.)
 - o Categories of data
 - o List of all third-party recipients of the data
 - o Copy of aggregated data from 3rd parties (mergeddata)
 - o How long data will be stored

NAVIS clients will have access to specific features within the Marketing Suite to support their compliance with GDPR. This article will define the best practices your company must take within the Marketing Suite to stay compliant.

<u>Please note:</u> the processes that you will need to take are not automated by NAVIS, and your GDPR compliance relies solely on accurate behaviors from employees who handle your guests Personally Identifiable Information. **To help you navigate GDPR compliance, you can <u>click here</u> for our GDPR Readiness Checklist.**

Reservation Sales Suite

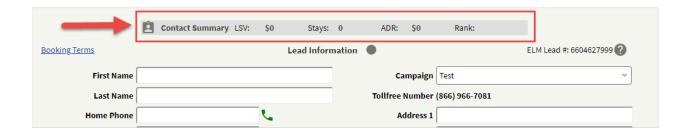
If you have the Reservation Sales Suite you will now also have a CRM moving forward, whether you subscribe to the Marketing Suite or not. There will be no change to the Reservation Sales Suite user interface, but if you also utilize HUB, your reservations team will see CRM fields at the top of the lead form now. This will be detailed on pages 2-3.

The CRM will be accessible to our clients with the Reservation Sales Suite only (meaning those without the Marketing Suite) in a "View Only" mode. There will be no export functionality unless you are also a Marketing Suite client. It is recommended that you assign a supervisor level or above employee to act as your business' GDPR point person. This individual will process all GDPR related requests and act as the point person for any GDPR related questions. Please note that call recordings should never be shared with guests even if requested, as they may contain the Personally Identifiable Information (PII) of other individuals. Guests cannot request to be completely "forgotten" from NAVIS systems, as our clients use recordings to audit for pricing and/or stay issues.

Within the Reservation Sales Suite, whether you utilize the Marketing Suite or not, you will be able to search for all guest records if a GDPR request comes in and will be able to export all PII data that is stored on a guest in order to adhere to GDPR. If the guest is wanting to change any of their data on their record, it is recommended that you make those changes in your PMS for any booked stays. CRM records from leads only (without a booking in the PMS) should be updated directly in the CRM. Deletion of records can happen directly in the CRM for any secondary profiles. This process will be detailed in pages 6-9.

Lead Form

For our clients who utilize HUB, there will be a CRM ribbon at the top of the lead form:



The NAVIS best practice is that reservation team members should reference this ribbon at the top of the lead form to quickly identify a guest's stay history. It is important to note, however, that you should not assume previous stay data simply based on this information since someone else from the household may be calling, or the guest could be calling from a different number.

Lead forms will now also feature an "Opt-Out" checkbox next to the email field on the lead, as shown below. Reservation team members should select the Opt-Out checkbox for any guest expressing a desire to avoid future marketing communication. Please note that this does not apply to transactional messaging such as confirmation emails.

Email Address:	DNA RTG OptOut

It is also recommended that when asking for the email, reservation team members ask in such a way that makes it apparent they may be marketed to. This will ensure that guests who do not wish to have marketing materials sent to their email are filtered out prior to those sends occurring, ensuring your GDPR compliance. A few examples of how to ask in this manner are below:

- "Mr./Mrs. _ _, could I get an email address so that we can send you a confirmation and any future specials?"
- "Mr./Mrs. _ _, could I get an email address so we can send you any future specials?"
- "Mr./Mrs.____, I will be sending you a follow-up email momentarily, could I have your email address to do so and so we can send you any future specials?"

Another change within the lead form is that the "Country" field will now be configurable to be mandatory or not. NAVIS suggests as a best practice that you require the country to be gathered and entered before a lead can be saved. If you decide to capture the "Country" field data, NAVIS suggests that your reservation team members identify the caller's country during the initial availability search on each new reservations call. Sample verbiage could be:

"Let me take a look at availability for your dates. Where will you be joining us from? What brings you to our area?"

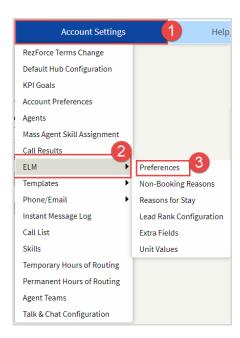
Configuration and Reporting in the Reservation Sales Suite

Below you will find configuration and reporting options within the Reservation Sales Suite to support your

compliance with GDPR. Please work with your Client Success Strategist to determine which settings will best benefit your specific business needs.

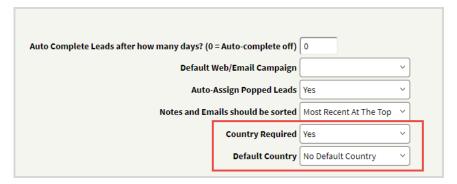
Configuring the "Country Required" Setting

To configure the Country field to be mandatory, you will navigate to Account Settings>ELM>Preferences



You will then find a setting to make the "Country" field a required input for saving a lead form.

You will also have the ability to select a "Default Country," allowing for the pre-selection of a value. Please note that the selection of a default country value other than "Blank," makes the Country Required setting irrelevant, so ensure you only choose a default country if you choose to not require the country on each lead.



With the Country Required setting activated, should reservation team members attempt to save a lead without a country having been selected, they will receive the following notification:



Exporting Lead Data

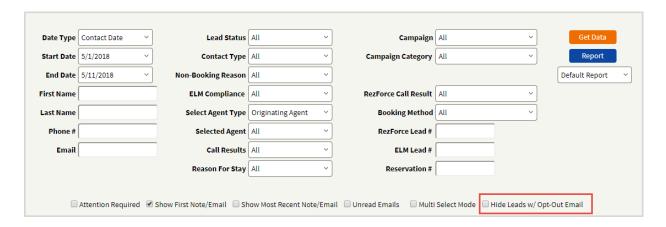
With the addition to the lead form of the new "opt-out" email checkbox, this value will be accessible from the view of all leads. To find this data, navigate to Leads>Leads>New Filter



On this lead grid, you will see a new column next to the "Email" column that will indicate the "Opt-Out" value. This view of the grid also extends to exports made from All Leads. Please note: if you already have custom reports made, you should review them to ensure that they have this newly available "Opt-Out" value included.



Should you utilize this data for e-mail blasts, you must ensure that emails with the Opt-Out value indicated are not included in your sends. You can easily do so by selecting the "Hide Leads w/Opt-Out Email" box:



Complying with GDPR Requests

Should your company receive a request for guest information through GDPR regulations, the person you have designated as your GDPR point person will need to provide the requested information from the CRM. Before providing this information, it is highly recommended that the guest is asked to provide at least two (2) pieces of contact information to verify their identity. These pieces of information include future check-in dates/previous stay dates, email address, billing address, and billing zip code. It is not recommended that you verify using a phone number as it is more easily accessible.

Sample verbiage of asking the guest to verify their information could be:

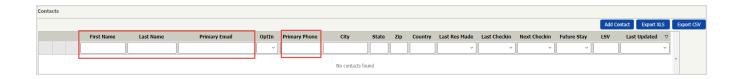
"I would be happy to assist you with your file. Before I provide this information, for security purposes, could you please verify your email address and billing zip code?"

It is against PCI best practices to first read the information back to the guest as a form of verification, it is always recommended the guest has to verbally provide the data themselves.

Once the guest is verified you will want to access the CRM for their requested information. To access the CRM, you will navigate to Products>360 CRM>Contacts

Once within Contacts, you can simply search for the requested guests' information via a variety of fields such as:

- First & LastName
- Primary Email
- Primary Phone

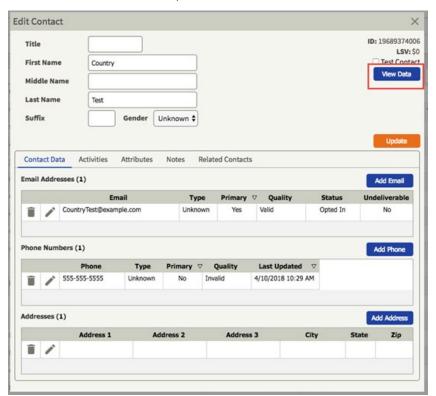


Once you have located the guest in question, you will want to export the data to a CSV file. Please note that it is a GDPR requirement that the data is delivered in a machine readable file such as CSV.

Click on the View/Edit icon next to the guest contact card to select the data for export:



Once within the contact card, select View Data:



General Data Protection Regulation (GDPR) Reservation Sales Suite Best Practices

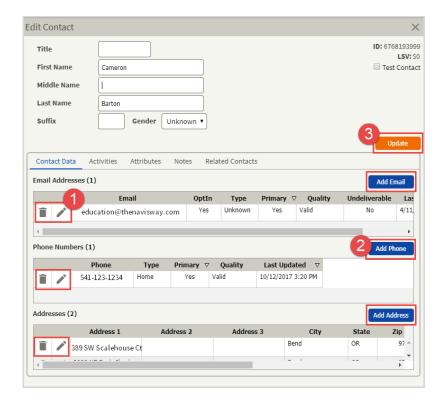
The CSV file will look as such:

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["datasource":"Gontact Name","value":"Country Test","auditData"strue,"marketingData"strue),
["datasource":"Fhone","value":"S5555555", "auditData"strue,"marketingData"strue),
["datasource":"Gender","value":"Unknown","auditData"strue,"marketingData"strue),
["datasource":"Gender","value":"Wanketing-"auditData"strue,"marketingData"strue),
["datasource":"Activity Attributes","value":"Marketing-"auditData"strue,"marketingData"strue),
["datasource":"Activity Attributes","value":"Marketing-"auditData"strue,"marketingData"strue),
["datasource":"Activity Attributes","value":"Marketing-"auditData"strue,"marketingData"strue,
["datasource":"Activity Attributes,"value":"Marketing-"auditData"strue,
["datasource":"Activity Attributes,
["datasource":"Activi
```

Should a guest request that their information be edited, you can simply do so by clicking the pencil/Edit icon next to their contact information:



This will open the Edit Contact window in which you can edit or delete Email Addresses, Phone Numbers, and Addresses (1). You can also add contact information within this screen (2). Finally, once you have edited the contact as requested you must select "Update" (3):



References

Below are some references regarding GDPR and its effect on your business, for further support please reach out to your Client Success Strategist.

General Industry Reference:

https://www.gdpreu.org

https://www.eugdpr.org/eugdpr.org.html

Free GDPR Assessment Tool:

https://www.beekeeper.io/en/security/GDPR?utm_campaign=Press&utm_source=gdpr-clock

Understanding GDPR Consent to Marketing:

https://gdpr.report/news/2017/05/26/time-now-cleansing-data-improved-customer-engagement-gdpr-compliance/

Hotel GDPR Compliance & PCI Information:

https://hospitalitytech.com/hospitality-unprepared-gdpr