

# Hospitality data protection and privacy

**hotel DPO**  
the business of data privacy for hotels



Corporate member



# Introduction

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We provide data protection and privacy management systems, support and training, specialising in hospitality. Together with outsourced data protection officer services for larger hotel operators and technology vendors.

Experienced in hotel operations, sales, marketing and the implementation of technology in hotels around the world.

What I am talking about today is presented as “for hotels” but there are elements of this which are still relevant to other parts of the hospitality industry.

# What is data protection in 2023

## **A lot has changed since 2018**

If a hotel hasn't updated its data protection and privacy capabilities since May 2018, whatever it did then will not work in 2023.

It won't enable direct marketing. In fact the reverse will happen. You won't be able to use personal information to sell to more people, ***because you don't prove why they should trust you.***

A hotel "Tech stack" - Use of technology and the need to enable it – will need a lot of attention looking at exactly what each technology vendor is doing to help you with data protection and privacy.

# The Immediate Threat

- Several hotel groups have suffered a cyberattack
- “Unauthorised access”
- Online reservations disabled
- Customer confusion and frustration
- No online sales for days
- “Follow on” threat to customers



"That's not a cybercriminal!"



"***This*** is a cybercriminal!"

# What are consumer expectations of data protection?

## Top influencer characteristics which facilitate data sharing

1. Trust - Guests want to understand how a hotel uses their data
2. Value – Guests believe there is a clear link between the data they share and value they receive
3. Control – Guests expect the ability to control their data and actively manage their privacy preferences before, during and after a stay.

# What does data protection mean for hotels?

## Three areas a hotel will struggle to achieve

1. Regulatory Challenges – Fluid interpretation, hard to keep up with
2. Enable sales & marketing –Using data protection and privacy to unlock guest data and improve sales.
3. Data Processor Responsibilities - Hotels have little or no direct control over vendor processing yet is held responsible for it.

# Attitudes towards using personal data

## Conclusions

- **Yes** people are prepared and ready to book with hotels, **but** they are also expecting more responsibility as part of the overall exchange.
- If a hotel can create the right conditions for sharing personal data, to prove why they can be trusted with personal information and that can make use of it to deliver value and improved service, these are things people will respond positively towards.

Here is the place where most hotels could make improvements which will have an immediate and lasting impact.



# Enable the use of personal information

- If a hotel is working hard on “cash-in”, part of that work involves trying to find more customers and selling more to them.
- To do that, they need to make use of their personal data, whether they already have it languishing in a database within the hotel, or plan to collect it as they attract new customers.
- And to do that, they need to **enable** those databases and the technology involved. You need people to trust you enough to share their personal data with you and allow you to use it.
- Which is where data protection and privacy is critically important. **You can leverage it to enable your ability to use personal data.**

# New & Old Technology

- The last 3 years have seen an acceleration of technology update, not experienced by hospitality ever before.
- This includes self-service, hotel apps, digital keys, QR codes replacing menus.
- Which has also given rise to technology companies offering business intelligence with very little regard given to data protection.
- Any new technology that is introduced to a hotel, hardware or software, should be subject to updating your record of processing at the very least.
- Vendor assessment should be carried out to ensure they have a data protection framework in place.

# Changes in Hotel Technology

- Alongside legacy technology, new systems can become silos of information. Where personal data is stored for longer than it's needed to deliver your obligations to the guest. The phrase that comes to mind is that personal data travels but doesn't check out when your guest does. Making it a target for hackers and at risk of data loss.
- These technology vendors are processing data on behalf of the hotel. The responsibility to safeguard the guest and their information is still the hotels.
- You can establish control by submitting vendor data protection assessments to ensure your technology suppliers are working with your best interests in mind.
- You can also review your records of processing activities and data processing agreements.

hotelDPO can help you with these tasks.

# The Hidden Dangers In Technology Silos

- Think of a hotel “Tech stack” as a technology iceberg with only a few pieces visible above the water, for example, PMS. All of the other myriad of vendors and data processors are unseen by guests and largely not controlled by a hotel team.
- For example, have you considered looking at the integration partners listed by your PMS vendor? These are companies they could be sharing guest data with. Which is not necessarily a problem as long as you recognise that as the data controller you are responsible for whatever they’re doing.

The next slide explains the technology iceberg problem:



## Your Technology Iceberg

- Property Management System
  - Email
  - CRM
  - Website/OTA
  - Booking engine
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## Hidden silos of guest data

- CRM
- GDS presence
- Channel manager
- Email autoresponder
- SMS marketing system
- Event management system
- Membership management
- Point of sale system
- Spa booking
- In-room dining
- Payment and accounting systems
- Mobile apps
- AI-supported Personalisation
- Telephone/voicemail
- Online Chat and chatbots
- Guest information – hotel internal, F&B, leisure club, entertainment
- Guest information – Local amenities, services, events and attractions
- Key systems
- CCTV

# Technology Issues

- Without control of these technology vendors hotels are leaving themselves and therefore their guests vulnerable to a data breach.
- There are vendor webinars offering horror stories such as promoting the use of, “data guests inadvertently leave behind”, QR code menus which result in guests being bombarded with offers and the insistence that hotels own the personal information of their guests.

Hotels must establish control of technology. The risk of a data breach makes it more difficult to earn and keep guest trust.

# What to do next

## **Data Protection & Privacy for customers**

If it was based only on “compliance” with anything a hotel programme has probably already run out of steam.

A hotel's ability to use personal information needs to be re-invigorated if they are to play a part in the modern data economy.

If a hotel wants to revitalise their databases.

If a hotel wants to convert more enquiries, get more from existing guests, bring old business back and find new customers, you need to be confident in your data protection and privacy abilities...

## Three Takeaways

1. Guests are making data share/don't share decisions on a booking by booking basis;
2. Trust is now the leading consideration when deciding whether to share personal information;
3. When it comes to using technology, hotels are responsible for something often out of their direct control.

*Are you risking being a data *out-of-controller*?*



# Using personal data in 2023

## **2023 will be very different**

- Hotels need a strategy.
- Hotels need to be able to give you use of personal information some strong direction.
- At least, if you want to be able to play a part in the modern data economy you will.
- However, a hotel needs to be careful that the technology tail doesn't wag the dog.
- You need to stay in charge of all this.

# An example of what's coming: ISO31030

## **What does it mean to hotels**

- Travel risk is the No:1 consideration of travel managers
- Data protection is the only threat to travelers before, during and after a hotel stay
- Travelers are becoming more aware of their digital rights
- Data protection will be driven by guests
- BSI working group will create supply chains in to ISO31030

## What to do next

Take steps to earn more customer trust by using data protection and privacy to support your business.

Are we the right people to help you?

There are practical, useful options available for you.

**Visit:** [www.hoteldpo.com](http://www.hoteldpo.com)

**Or call:** 01786 439 566

**Linkedin:** [linkedin.com/company/hoteldpo](https://www.linkedin.com/company/hoteldpo)

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