

Avvio

**Avvio Data Processing Overview – 25<sup>th</sup>  
April 2018**



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## 1. Avvio Data Processing Overview

The following is an overview of the personal data processed by the various services available to The Avvio Clients on the Avvio system. You may not be using all the Avvio services listed below, so you will only need to examine the ones you work with.

Under GDPR, Avvio are considered the Data Processor, whilst The Avvio Clients are the Data Controllers

This overview should not be used as your privacy policy, but instead as a knowledge-gathering document in terms of what personal data the Avvio system processes on your behalf through default use of its services. You can also use it for GDPR audit purposes. Your privacy policy should contain much more comprehensive information as to how you process personal data across your business.

In the coming weeks, Avvio will be contacting you in relation to signing a separate Data Processing Contract addendum to ensure our relationships are GDPR compliant.

*Note: Some of the information below will take into account new features that will be released on the Avvio system on May 22<sup>nd</sup> 2018.*

## 2. Avvio Services

The services of the Avvio system covered by this document are as follows.

- Room Booking Engine
- Waitlist Enquiry Form
- CRM Contact/Enquiry Form
- Newsletter Signup Form
- CRM / Corporate User Accounts
- Voucher Engine
- Allora
- Avvio System User Accounts

If you use Avvio website design and digital services and have personal data processing queries in relation to specific offerings of those services, then please speak to your contacts in those relevant depts. for more information.



### 3. Purpose of Processing

Avvio provides the Services (as defined in the Contract), which includes the Booking Engine Service, which is a software-as-a-service booking engine platform that facilitates the booking of hotel accommodation and administrative tasks relating to those bookings. The Processing is carried out in its entirety on behalf of, and in accordance with the instructions of, you, The Avvio Client. More specifically, Avvio Processes the Personal Data in order to:

- Provide The Avvio Client with sufficient contact information for persons (booker and/guest) to make bookings for accommodation; to manage their booking; and to allow The Avvio Client to contact the booker and/or guest in respect of the stay;
- Facilitate payments to guarantee bookings or in the case of advance purchase or deposit rates to process a payment as part of the booking process;
- Enable certain Avvio Clients and their workers to use Avvio's Central Reservations Office portal ('CRO') to perform availability searches across The Avvio Client's portfolio of properties to complete accommodation bookings on behalf of their customers;
- If requested by booker/guest, add booker/guest details to waiting lists if their preferred booking dates are unavailable at the time of attempting a booking;
- If requested and/or used by The Avvio Client, facilitate the sale of vouchers via the Booking Engine Service and confirmation to The Avvio Client of the purchaser and the beneficiary of vouchers;
- If requested and/or used by The Avvio Client, facilitate The Avvio Client's customers to create user accounts on [The Avvio Client's website] for future bookings with the Hotel Customer and for The Avvio Client's CRM purposes;
- Facilitate users of the Booking Engine Service to make general enquiries to The Hotel and to contact The Hotel Customer;
- Facilitate sign-up to The Avvio Client newsletters and to facilitate The Avvio Client's export of these details to third party of The Avvio Client's choice;
- Facilitate The Avvio Client's creation and management of user accounts for its workers' access to the Avvio management console for The Avvio Client's administrative purposes;
- Synchronize and otherwise send personal data of guests and customers to The Avvio Client's service providers, as instructed by The Avvio Client (e.g. Property Management Systems; Channel Manager Systems; Global Distribution Systems);
- Facilitate The Avvio Client's receipt of booking requests from third party systems as instructed by The Avvio Client (e.g. Tripadvisor instant booking [and other online booking engines]);



- Facilitate The Avvio Client's request to personalise and enhance the booking experience for website visitors based on their stage in the booking process.
- Enable Avvio to assist The Avvio Client with technical and support issues.

## 4. Personal Data we collect

The Personal Data that is processed on behalf of The Avvio Clients for the various areas of our system are as follows:

### 4.1 Room Booking Engine:

Avvio Processes the following Personal Data on behalf of The Avvio Client as part of the booking process, unless The Avvio Client requests Avvio disable the categories of personal data underlined below through the management console:

- Booker Title; First Name and Surname
- Booker Email Address
- Booker Telephone number
- Booker Address (including city/town; country and post code)
- Booker Company Name
- Cardholder Name; Address;
- Payment Card type, number, and expiry date;
- Guest Company Name
- Guest Title
- Guest First Name (First Name and Surname)
- Guest Email Address
- Login ID
- Account ID (if customer was logged onto CRM when making the purchase)

In addition to the information entered by the consumer we also capture background information concerning the device that was used including:

- Device Type
- IP Address
- IP Country
- Cookie ID
- Cookie Creation Date



## 4.2 Waitlist Enquiry Form

Avvio Processes the following Personal Data on behalf of The Avvio Client as part of the booking process, where a person wishes to be added to a waiting list if their preferred booking dates are unavailable at the time of booking:

- Requester Title, First Name and Last Name
- Requester Email Address
- Requester Telephone number

## 4.3 CRM Contact/Enquiry Form

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate users of the Booking Engine Service to make general enquiries to The Avvio Client and to contact The Avvio Client:

- Name (First Name and Surname)
- Phone Number (Mobile/Landline; Country; Area)
- Email address

Note: This information relates to the default contact/enquiry form the Avvio system creates as part of our CRM service. If you have engaged with the Avvio Design team previously to create custom contact forms (e.g. for Spa, Golf, Conference, Competitions etc.), then they are outside the scope of this document and the data processed may be specific to your property. Please review your site and consult with Avvio design team for more data processing info on these type forms.

## 4.4 Newsletter Signup Form

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate The Avvio Client's customers sign-up to The Avvio Client newsletters.

- Name (Title, First Name and Surname)
- Email address
- Country
- IP Country



## 4.5 CRM / Corporate User Accounts

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate The Avvio Client's customers to create user accounts for future bookings with The Avvio Client and for The Avvio Client's CRM purposes.

- Email address and password
- Name (Title, First Name, Middle Name and Surname)
- Address
- Phone Number(s) (Mobile/Landline; Country; Area)

## 4.6 Vouchers

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate the sale of vouchers via the Booking Engine Service:

- Purchaser Name (Title, First, Middle and Surname)
- Purchaser Email Address
- Purchaser Address
- Purchaser Phone Number(s) (Mobile/Landline; Country; Area)
- Recipient Email Address
- Recipient Name (First and Surname)
- Recipient Address (if postal voucher)
- Login ID
- Account ID (if customer was logged onto CRM when making the purchase)

In addition to the information entered by the consumer we also capture background information concerning the device that was used including:

- Device Type
- IP Address
- IP Country
- Cookie ID
- Cookie Creation Date

## 4.7 Allora

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate a personalised and enhanced booking experience for customers on their website.

- Name (First Name and Surname)
- Email address
- IP Address
- IP Country
- Cookie ID



## 4.8 Avvio System User Accounts

Avvio Processes the following Personal Data on behalf of The Avvio Client to facilitate The Avvio Client's creation and management of user accounts for its workers' access to the Avvio management console for The Avvio Client's administrative purposes:

- Name (First name and Surname)
- Email Address
- Username and password

We also have fields for the following but we do not generally request these from The Avvio Clients.

- Job Title
- Mobile Phone Number

## 5. Personal Data Retention Periods

With GDPR, you are required to store personal data for no longer than you need to. As a result of this, from May 22<sup>nd</sup> 2018, Avvio will roll out changes to the length of time we store personal data. For statistical reporting reasons, we can't delete data in some instances, but we will be anonymising it.

Here are the areas we will be updating as follows...

- *Room Bookings*: Anonymise personal data automatically 60 days after person has checked out (Note: This will not send update to PMS / Channel Manager)
- *Waitlist Enquiries*: Anonymise personal data automatically 30 days after proposed checkin date
- *CRM Enquiry Form Submissions*: Delete automatically from database 30 days after it has been submitted
- *CRM User Accounts*: Anonymise personal data automatically 30 days after account is suspended or deleted. Data will also be anonymised if user hasn't logged in for over 2 years. In terms of individual CRM Account requests that haven't been accepted by the property, they will automatically be deleted after 60 days.
- *CRM Newsletter Signup*: When you do an Export of Newsletter Recipients from our CRM module to upload into your own email marketing platform, that will automatically mark those signups as to "to be deleted" on the Avvio system. After 30 days, they will physically be deleted from our system. Therefore it is important to note that if an issue occurs in the extract of your signups, you will have 30 days to contact [support@avvio.com](mailto:support@avvio.com) to



assist you in retrieving the latest signups before they will be deleted.

- *Voucher Purchases:* Anonymise personal data automatically 60 days after voucher is marked as redeemed on Avvio system or 2 years after voucher has been purchased.
- *Allora:* Delete personal data automatically 120 days after visit
- *Avvio System User Accounts:* When a staff member with access to the Avvio system leaves a property, The Avvio Clients should notify [support@avvio.com](mailto:support@avvio.com) as soon as possible to suspend/delete that person's user account. For security purposes, Avvio will automatically suspend a user account after 90 days of inactivity. Avvio will automatically delete user accounts that have had no activity for over a year.

## 6. Lawful Basis for Processing Personal Data

Under Article 6 of GDPR, to process someone's personal data, you must have a valid lawful basis to do so.

For room bookings and voucher purchases, as the personal data is required for entering into a **contract between the Avvio Client** and the Hotel Client, then that is considered a legal basis for processing and is GDPR compliant.

However, there are other areas of our services where explicit **consent** received will be the lawful basis to process that data. From May 22<sup>nd</sup> 2018, new opt-in consent tick boxes will be available for the following areas we collect personal data from

- Waitlist Enquiries
- CRM Enquiry Forms
- CRM User Accounts
- CRM Newsletter Signup
- Remember Me
- Pre and Post Stay Emails
- Avvio User Accounts

## 7. Personal Data Location

All the Personal Data stored on the Avvio system is kept on secure servers in a trusted data centre in Cologne, Germany in conjunction with our infrastructure hosting partner, PlusServer (<https://www.plusserver.com/en>).



## 8. Personal Data Security

Avvio will adopt and maintain appropriate (including organisational and technical) security measures in dealing with the Personal Data in order to protect against unauthorised or accidental access, loss, alteration, disclosure or destruction of such Personal Data, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing.

In determining the technical and organisational security measures required, Avvio will take account of the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

Avvio have implemented the following specific security measures in respect of the Personal Data, as applicable:

- The Personal Data is stored on secure servers in trusted data centres with our infrastructure-hosting partner, PlusServer (<https://www.plusserver.com/en>).
- PlusServer are ISO27001 certified.
- Segregated private network that is only accessible by authorised Avvio employees and PlusServer system administrators. PlusServer system administrators do not have access to Personal Data stored within the Avvio platform.
- Network firewalls that monitor and control the incoming and outgoing network traffic based on predetermined access control lists.
- Host-based firewalls installed on each server.
- Network Intrusion Detection System to detect probes or attacks.
- Strict access policies and controls for server and application user access management.
- Local and offsite backups.
- Active monitoring of OS and software security lists with immediate patching for any security related patches.
- HTTPS encryption for all data transfer in and out of our platform.
- All API access requires user authentication.
- Tokenisation and encryption of credit card data.
- Active monitoring of system-level and application logs for any suspicious activity.

## 9. Personal Data Sharing with Third Parties

There are specific situations where Avvio will share data with Third Parties. Most of these situations are at the request of The Avvio Clients to integrate with Third Party systems and the Avvio Client will have the direct contractual relationships with those parties.

### 9.1 Datatrans (Avvio Controlled)

All cardholder data on the Avvio system is processed by Datatrans AG. Datatrans AG provide a service, PCI Proxy (<https://www.pci-proxy.com/>), to Avvio that essentially allows for a PCI Compliant secured storage and tokenisation / detokenization of credit card numbers and related card holder data.

The cardholder data processed depends on whether the booking is a guaranteed booking or whether a payment is transacted as part of the booking.

For guaranteed no deposit bookings, only the credit card number is processed by Datatrans AG.

For bookings with deposits then customer ID, IP address, cardholder name and CVV are also processed. Datatrans send the payment requests to our payment gateway partner, RealEx, for payment processing. For US or CA billing addresses the postcode and the first line of the customers address are also processed for the Address Verification Services provided by RealEx as part of their Fraud Management offering.

In addition to the above, a small amount of hotels have credit card number pass through from the Avvio platform to their PMS or Channel Manager. Therefore all reservation records are sent via Datatrans PCI Proxy service where they replace the credit card tokens with the actual credit card number. The reservation record contains the personal details of the booker and guests.

### 9.2 PMS and Channel Managers (Avvio Client Controlled)

The majority of Avvio clients will use a Property Management System (PMS) for managing their operations and a channel management platform for distributing their inventory and pricing across various channels including their direct channel (Avvio), OTAs (Expedia, booking.com, etc.) and other channels such as GDS (Global Distribution System) networks. Avvio provides direct interfaces to these platforms where ARI (Availability, Restrictions and Inventory) and Reservation data is automatically synchronised across the systems. The reservation data includes personal data for the booker and guests. (see above for more info on personal data collected on room bookings). Channel Managers typically would be SaaS based solutions and they would classify themselves as data processors. Property Management Systems may be either a Cloud based SaaS solution or on premise installed solution depending on the hotel preferences.



Please review this functionality and service with your respective contracted third party providers to ensure GDPR compliant personal data processing is in operation here.

### **9.3 TripAdvisor Instant Booking ( Avvio Client Controlled)**

The Avvio System has the capability to be able to process reservation requests that are initiated on other 3<sup>rd</sup> party platforms such as TripAdvisor Instant Booking. In this scenario the consumers search for availability on the TripAdvisor IB platform and then initiates the booking and enters their personal details on the TripAdvisor IB platform itself. TripAdvisor then sends the reservation request to Avvio's booking engine for processing. The personal data processed would be similar to what is outlined in the section above on information gathered during the room booking process. Avvio also has similar connections to other 3<sup>rd</sup> party platforms such as The Guestbook. Not all of The Avvio Clients would avail of these features and it would depend on their sales and distribution strategy as to whether or not they request for one of these types of connections to be setup and configured.

Please review this functionality and service with your respective contracted third party providers to ensure GDPR compliant personal data processing is in operation here.

### **9.4 Spa, Golf and Restaurant Booking Engines (Avvio Client Controlled)**

Avvio developed a feature that allows hotels to configure custom navigation links on the finished page and confirmation emails to 3<sup>rd</sup> party systems such as golf, spa or restaurant reservation systems. This would be used where hotels are selling package rates e.g. 2 nights B and B and one evening meal. The intention is that once the package is booked and confirmed that a link is displayed to the consumer that will take them directly to the 3<sup>rd</sup> party system for them to then book their meal, golf or spa treatment. It is possible for the hotel to add parameters containing personal data to the link such that input forms are automatically populated on the 3<sup>rd</sup> party system and saving the consumer from having to rekey that information. The system allows for the following personal data to be passed using URL parameters:

- Booking Reference Number
- Booker First Name
- Booker Last Name
- Booker Address Line 1
- Booker Town
- Booker County
- Booker Country
- Booker Zip



- Booker Email
- Booker Phone

Please review this functionality and service with your respective contracted third party providers to ensure GDPR compliant personal data processing is in operation here.

### **9.5 Avvio Channel Manager (Avvio Client Controlled)**

Avvio offers its own channel management solution called Avvio Channel Manager. This solution is a white label of SiteMinder, one of the industry's leading channel management providers.

For customers using Avvio Channel Manager Avvio has a specific ACM (Avvio Channel Manager) integration with SiteMinder where all reservations processed through all channels configured on SiteMinder for that property are sent through to the Avvio booking engine and stored on the Avvio system. This includes reservations processed on OTAs such as booking.com, Expedia, etc. Personal data for the booker and guest is included with these reservation records. The personal data Avvio processes is the same as what is outlined in the section above in relation to personal data collected via the Room Booking Engine.

### **9.6 RealEx Payment Gateway (Avvio or Avvio Client Controlled)**

Avvio may share personal data with a RealEx payment gateway account for transaction processing situations where

- A. Room booking requires a deposit to be taken at time of booking OR
- B. Voucher is purchased

The personal data processed in these scenarios are as follows...

- Cardholder Number
- Cardholder Name
- IP address
- Customer ID

*Note: For PCI Compliance purposes, the CVV value is solely used for credit card processing and is never stored.*

The Avvio system passes the payment data to the Avvio credit card processing partner (Datatrans), who in turn send the data to RealEx, for payment processing. For US or CA billing addresses the postcode and the first line of the customers address are also processed for the Address Verification Services provided by RealEx as part of their Fraud Management offering.



Generally, Avvio will integrate with The Avvio Clients' own RealEx account for Payment Processing. So please review your Data Processing contract with RealEx to ensure GDPR compliance.

## 9.7 Third Party Scripts ( Avvio Client Controlled)

There are times when The Avvio Clients request Avvio to insert various third party widgets and tracking scripts onto the Avvio system pages. While Avvio facilitate these requests, Avvio does not have full knowledge of the personal data captured by these scripts or the cookies they may store on Avvio pages. Therefore, Avvio cannot be responsible for their operations.

Please review this functionality and service with your respective contracted third party providers to ensure GDPR compliant personal data processing is in operation here.

## 10. Cookies

The following cookies are generated and used by the Avvio system services. Please ensure they are added to your cookie policy.

Cookie Name	Cookie Purpose	Expiry	Category
CSSID	This is a session cookie and is used only to link a browsing customer with a server session. It is a mandatory cookie and does not contain any personally identifiable information	Session	Essential
crm	Used to store information about authenticated users (accountID) or promo code used by a browsing user on a hotel site. This is a mandatory cookie and functionality of the booking engine is severely limited without this cookie. The information contained in this cookie is not shared with any third party.	13 days	Essential
avvio_persp	Used for Personalisation V2 (recommender engine) tracking to personalise and tailor a guests website / booking engine experience. Only a cookie ID is stored in the cookie which points to a matching record of user activity on the hotels booking engine for personalisation purposes. As a user interacts with the hotel (searches for availability on certain dates, makes	119 days	Functional



	<p>booking, etc.) Avvio updates the information it has on that user for that property. This information is then used to personalise the website experience for that user if they return to the website again. Personalisation options include remembering the preferred dates of stay in the event that the user has not yet made a booking, or remembering their name and arrival date if they are a pre-stay customer seeking additional information (e.g. directions, upgrades) on the website. The data contained in avvio_persp and the data associated with that cookieID is not shared with any third parties and is used exclusively for personalisation</p>		
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## 11. Child Data

No personal data on children is ever requested by default on the Avvio system. If any of The Avvio Clients have tweaked the Avvio system to request personal data on children, please notify [support@avvio.com](mailto:support@avvio.com) as soon as possible.

## 12. Special Category Data

In relation to Article 9 of GDPR, no special category data is ever requested by default on the Avvio system.

Special category data types are as follows:

- Race;
- Ethnic origin;
- Politics;
- Religion;
- Trade union membership;
- Genetics;
- Biometrics (where used for ID purposes);
- Health;
- Sex life; or
- Sexual orientation.

If any of The Avvio Clients have tweaked the Avvio system to request special category, please notify [support@avvio.com](mailto:support@avvio.com) as soon as possible.



### 13. The Avvio Client Account Termination

In cases where an Avvio Client chooses to leave Avvio and move to another provider, the following will happen on the agreed contract termination date...

- The Avvio Client will have 1 additional week to export any relevant room and voucher transactions that they wish to obtain from the Avvio system. These reports can be downloaded in an Excel/CSV readable format. The same applies for Newsletter Signups that are stored on the Avvio CRM database.
- All user accounts will be shut down subsequent to that.
- The Avvio Client data across all Avvio services will be marked for anonymisation and within one month this data will be anonymised.

### 14. Subject Access Requests

Under GDPR Legislation, a customer will have the right to access all personal information the Hotel Client has on them. They will have the right to edit that data and have the right to be forgotten.

For any subject access requests you receive where you need Avvio to retrieve all personal data which Avvio store for that person, please contact [support@avvio.com](mailto:support@avvio.com) and provide them the email address of the individual requesting data. Please title the mail "Subject Access Request". Avvio will provide you a file on all info Avvio has on that individual, which you can use in conjunction with other data you may have on that customer from your PMS, Newsletter database etc. If that person wishes us to change or delete that data, Avvio can do this on your request too.

### 15. Data Breach

As a processor of personal data on behalf of your business, Avvio will also be required to notify you within 72 hours should any data breach occur.

Please provide your ecommerce manager in Avvio with your Data Protection Officer's name, email, phone number and the property they are based at by May 25<sup>th</sup> 2018. Alternatively, please email [support@avvio.com](mailto:support@avvio.com) with those details with the subject line: "Data Protection Officer – Your Hotel Name"



## **16. Avvio Data Protection Officer**

Avvio will give further information in relation to our Data Protection officer in the next update.

