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Introduction

Before reading this document, we encourage you to review the [protel GDPR General Information](#) which provides an overview of both GDPR and the approach that protel has taken to provide related tools for our customers, the “data controllers”.

As a protel customer, your property management system and its Cloud based extensions is hosted in one of Amazon’s data centres, classified as one of the most secure hosting providers in the world. Which data center is used for your hotel depends on the geographical location of your property. In case you are not aware of the hosting location, your protel service partner can provide you with this information.

The following sections in this document describe in detail the functionality that has been developed and implemented in protel Air, and specifically designed to assist our customers (“data controllers”) in abiding to the GDPR regulations.

It is the responsibility of each hotel to implement and decide how the hotel wishes to use the functionality. In this document we aim to provide you with our best recommendations for compliance. However, you are also welcome to contact your protel service partner who can assist you with any questions or advice.

We urge you to review your entire technology landscape when implementing procedures related to GDPR, and remind you that it is not only your property management system that may hold data classified as PII (Personal Identifiable Information) data.

While GDPR may seem daunting, it is not as complicated as one may expect. Essentially it consists of three elements:

- ▼ Identifying a consent level for each profile
- ▼ Obliging to the consent level of each profile, and anonymizing their data as instructed
- ▼ Providing the guest with complete information about their data at any given time

Let’s get started.

Requirements

At first contact with the “data subject” or guest in our case, the hotel must inform the guest regarding the personal identifiable information (PII data) which is being collected and stored, for what reason and for how long. The first contact can be over the phone, or when the guest checks in to the hotel, but it can also be when the guest makes a reservation via the booking engine.

We consider our booking engines as a first contact point with the guest. As the Voyager app is only provided when the guest already has made a reservation, it is not considered as a point of first contact. However, we implement the possibility for hotels to inform the guest about their privacy rights, to determine their own privacy settings, and to opt in to both the direct marketing and data processing options in the following products:

protel Air: protel Air WBE, WBE5

protel SPE/MPE: WBE5

Consent levels and Marketing opt ins

If your hotel has the consent level “minimum” set as default, there is no need to receive additional consent from the guest. You only need to inform the guest about this consent. If no consent level is made available on the booking engine when a reservation is made, the profile will be created in the PMS with the default anonymization setting. For this reason, it is required that “minimum” time frame is the default consent level in your PMS.

If you want to store the guest data for longer than legally permitted, you need to inform the guest about the extended period. Furthermore, you need to receive consent from the guest.

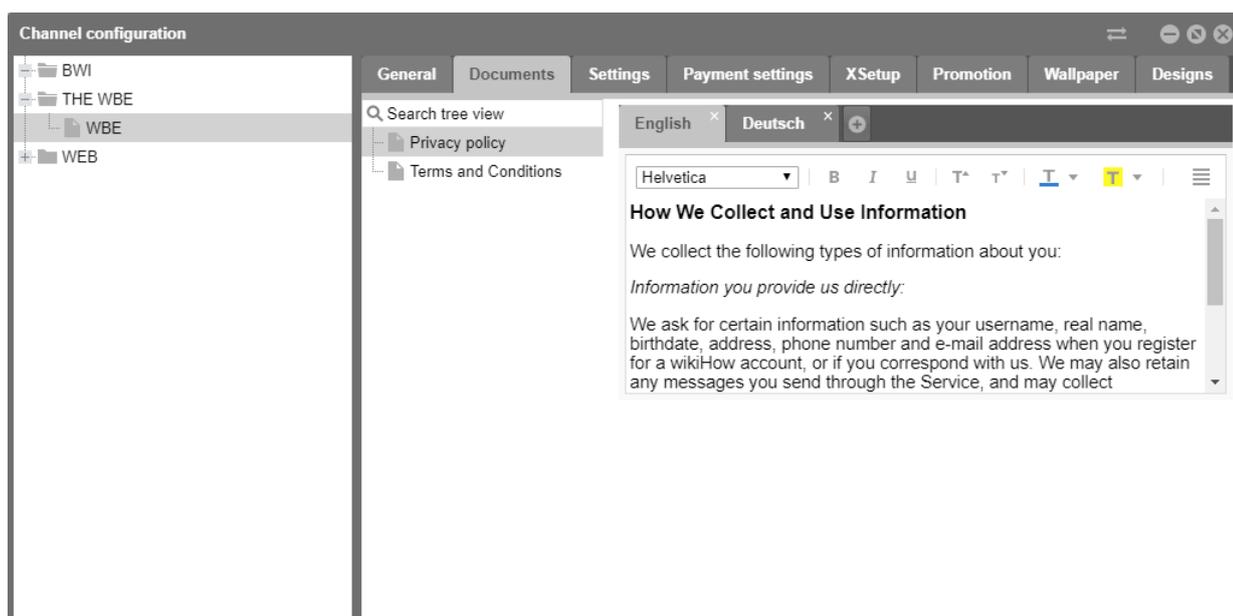
We will provide the option for your hotel to provide up to three different consent levels via our booking engines protel Air WBE and WBE5. These three levels align with the three levels in our PMS systems.

- ▶ Detailed information on the three consent levels can be found in our documents concerning “[GDPR for protel Air](#)” and “[GDPR for protel SPE/MPE](#)”.

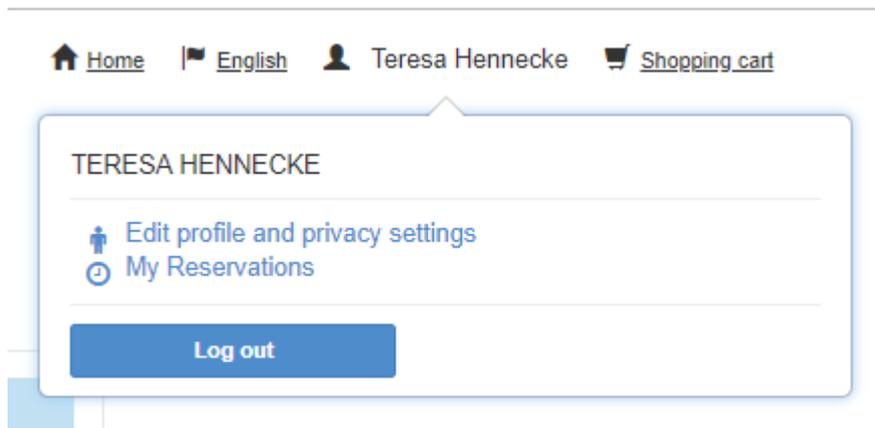
If your hotel wants to provide an option for the guest to opt in to the Direct Marketing and Data Processing agreements, this will also be available. However, if these options are not made available to the guest, the default will always be set to **Unticked** or **False** in the PMS

- ▶ Please note: for the older versions of our booking engines (nfWBE, protel Air WBE (original version), WBE3, WBE4 and Voyager V1) we will not be developing the front end for these options. Therefore, we recommend you to set the minimum consent level as default when using one of these products.
- ▶ Please note: for the protel Air WBE and the WBE5 the privacy settings will apply to the booker of the reservation. If the booker is the guest, then the privacy settings are utilized appropriately. If the booker is different from the guest, the privacy settings will not be applied to the guest, since they are not yet present in order to make the decision on their requested privacy level.

Task: Compose the information which should be provided to the guest at “first contact” and update your terms and conditions document within the menu: “Online booking > Channel configuration”.

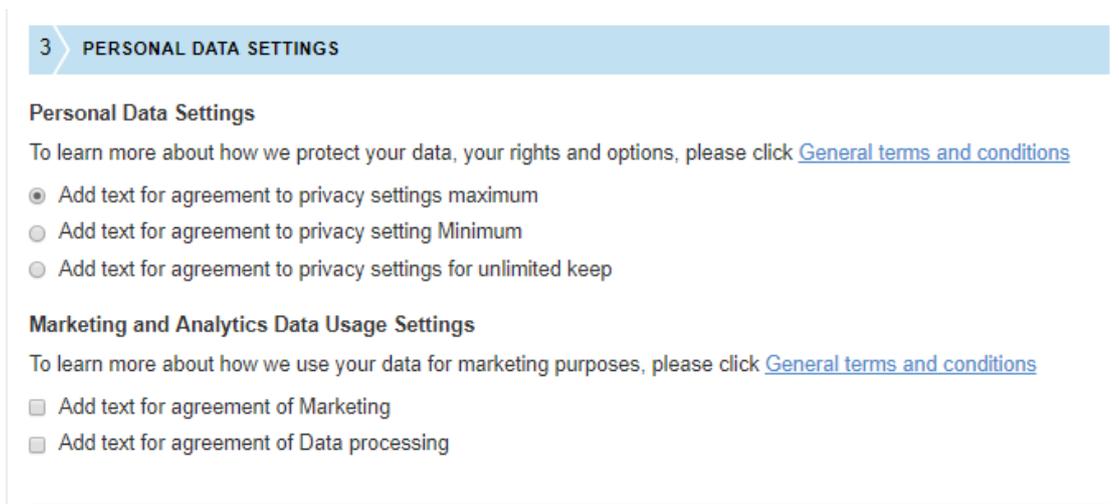


These texts will be shown for the guest when they are making the booking and selecting the privacy settings in their user profile.



Activating consent levels and marketing opt ins

The consent levels and the marketing and data processing opt-ins will be shown in a new section with the heading “Privacy Settings”. When active, they appear during the booking process and when the guest has created a user log in on the booking engine.

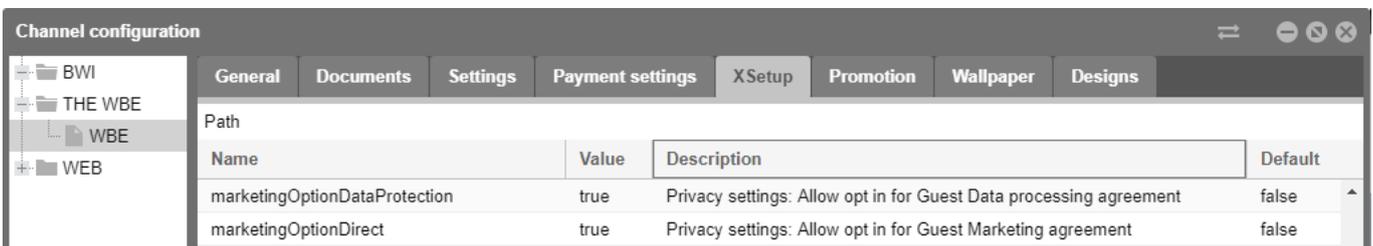
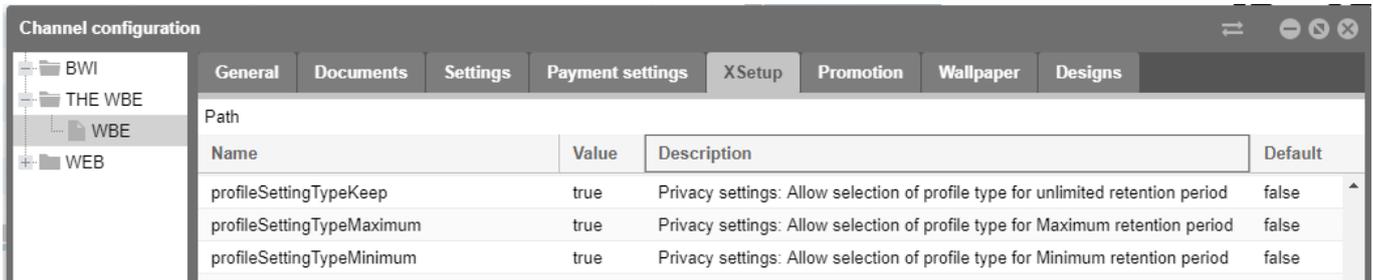


The activation of the privacy settings is done via XSetup. As soon as one of the three consent levels is activated, the new settings appear on the booking engine. The respective XSetup needs to be set to “true”.

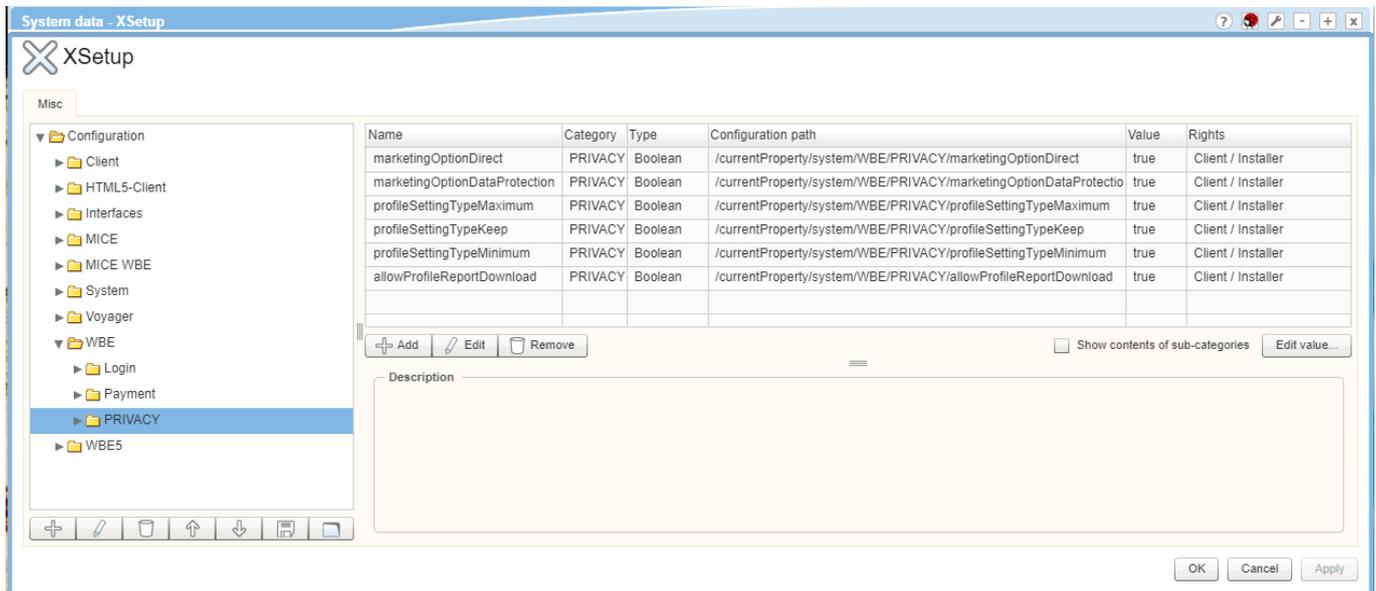
Both data marketing and data processing are available in the XSetups as well, and as soon as one opt in is set to “true”, the new privacy settings area appears with this option.

You can find the XSetups for the different web booking engines in the following locations:

- ▼ For WBE5: protel Cloud Center > Online booking > Channel configurations > choose your WBE > XSetup



- ▼ For protel Air WBE: Flash system data > System > XSetup > WBE > PRIVACY



Defining your texts

All explanatory texts in the privacy settings on your web booking engine can be determined by the hotel. The texts are added via the localization in the protel Cloud Center.

- ▼ Find out more about the localization in our [protel Cloud Center Help](#).

In order to ensure that you communicate to your guest with clear intention, we have prepared generic default texts.:

Type	Default text	Label for localization
Consent levels description	<i>To learn more about how we protect your data, your rights and options, please click here.</i>	<i>privacy_personal_data_settings_description</i>
Minimum retention option	Add text for agreement to privacy setting Minimum. eg1: <i>Please remove my personal data as soon as legally allowed.</i> eg2: <i>Keep my data for the minimum required time only.</i>	<i>privacy_personal_data_settings_remove</i>
Maximum retention option	Add text for agreement to privacy setting Maximum. eg1: <i>I agree for my data to be kept for x days</i> eg2: <i>I agree for hotel chain to keep my personal information for the extended period specified</i>	<i>privacy_personal_data_settings_automatic</i>
Unlimited retention option/ Keep	Add text for agreement to privacy setting unlimited keep. eg1: <i>I agree for my data to be kept by hotel chain until I change my mind and request its removal</i>	<i>privacy_personal_data_settings_keep</i>
Marketing opt ins description	<i>To learn more about how we use your data for marketing purposes, please click here</i>	<i>privacy_marketing_settings_description</i>
Direct marketing opt in	Add text here for agreement of marketing. eg1: <i>I agree to receive special promotions and marketing material</i>	<i>privacy_marketing_settings_marketing</i>
Data processing opt in	Add text here for agreement of data processing. eg1: <i>I wish to receive special offers and promotions based on my stay history and preferences.</i>	<i>privacy_marketing_settings_profiling</i>

You *must* enter these texts before using the data protection functions of your Web Booking Engine, otherwise only "empty" labels will be displayed!

The 'here' link in the description opens up the terms and conditions document. This is found in the locations mentioned below. Please add your data protection policies and definition of your marketing opt ins here:

- ▼ WBE5: protel Cloud Center > Onlinebooking > Channel configuration > choose your WBE > Docuemnts> Terms and Conditions
- ▼ protel Air WBE: Flash system data > External applications > Online booking > Overview > Terms and Conditions (Link)

Guest profile report request

Another requirement of the data protection provisions is to make it easier for the guest to request a report containing all information stored about them. In your protel PMS you can easily generate the report and hand it to the guest via the guest profile. While this is not mandatory for online presence, protel also offers this option in our booking engine products (not via Voyager products).

This is only available for guests who have created a user login within the hotel's booking engine and which is protected by a password which only they have access to. This ensures a level of security, enabling only the password holder to access this information.

Add text here to advise your customer their option to request a report of their personal data which you are storing

Request email

You can also customize the text in this field for your hotel.

- ▼ protel Air WBE: The report will be available immediately via a download link.
- ▼ WBE5: we use protel Messenger to send this request to a manual recipient in the hotel. This gives the hotel better control of these requests and helps the hotel to fulfill them.

Messenger rule

To send those messages via protel Messenger, a respective Messenger rule needs to be configured.

The respective event is "WBE – Guest requests guest profile report". In the "filter" area you need to add the email address of your chosen recipient in the "manual recipients" field. You can use the following text replacement codes in your message: First and last name, email address, date of birth, phone number, mobile number. If this data is stored in the respective guest profile, it appears in the email being sent to the hotel. This makes it very easy for the hotel to identify the guest and to send him the requested report via email.

The details in the downloaded profile report can be found in the respective documents for [GDPR and protel Air](#) and [GDPR for protel SPE/MPE](#).